

Retar

RCRA DRAFT PERMIT SIGN-OFF

PART I. BACKGROUND

FACILITY NAME General Electric Company Medical Systems Group
FACILITY LOCATION 315 W. Edgerton Ave., Milwaukee, WI
RCRA ID NUMBER WID 000 808 725
TYPE OF PERMIT

<input checked="" type="checkbox"/> Storage	<input type="checkbox"/> Treatment	<input type="checkbox"/> Disposal
<input checked="" type="checkbox"/> Container	<input type="checkbox"/> Tank	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Tank	<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Landfill
<input type="checkbox"/> Waste Pile	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Land Application
<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Other	<input type="checkbox"/> Surface Impoundment

PART II. REVIEW PACKAGE CONTENT

☒ Draft Permit w/Attachments
☒ Draft Public Notice
☒ Administrative Record, including
 Corrective Action Certification
 Screening for Environmental Significance
 Facility Management Plan (if applicable)
 (Other) _____

PART III. CONCURRENCES

	INITIALS	DATE	AGREE	DISAGREE
1. TECH. PERMIT CONTACT	<u>WCH</u>	<u>11/14/85</u>	(X)	()
2. CHIEF, STATE TECHNICAL UNIT	<u>CAT</u>	<u>11/15/85</u>	(X)	()
3. TECHNICAL EXPERT (If applicable)	_____	_____	()	()
4. SECTION CHIEF, TPS	<u>hmm</u>	<u>11/20/85</u>	(X)	()
5. SECTION CHIEF, AIS	_____	_____	()	()
6. ASST. REG. COUNSEL, (ORC)	<u>MU</u>	<u>11/1/86</u>	(X)	()
<u>REHAR</u> 7. SECTION CHIEF SWERB (ORC)	<u>act</u>	<u>11/10/86</u>	(X)	()
<u>FIELD</u> 8. BRANCH CHIEF, SWERB (ORC)	<u>M6</u>	<u>11/12/86</u>	(X)	()
<u>GADE</u> 9. CHIEF, SOLID WASTE BRANCH	<u>DS</u>	<u>11/14/86</u>	()	()

see
p8, 11

PART IV PUBLIC NOTICE

10. CHIEF, AUTHORIZATION AND
 INFORMATION SECTION

11. PUBLIC PARTICIPATION
 SPECIALIST

Public Notice Date _____

STATEMENT OF BASIS
GENERAL ELECTRIC COMPANY
MEDICAL SYSTEMS GROUP - MILWAUKEE, WISCONSIN

WID006078141

This is a statement of the basis for the Draft Hazardous Waste Permit for the subject facility. It presents the rationale of the conditions contained in this draft permit. Under 40 CFR 124.7 (Title 40 of the Code of Federal Regulations, Section 124.7), the Statement of Basis is sent to the applicant and to any other person who requests it.

A. FACILITY DESCRIPTION

The General Electric Company Medical Systems Group Electrical Shop is located at 315 W. Edgerton Avenue within the city limits of Milwaukee, Wisconsin. This facility is one of the subassembly manufacturing installations of the Medical Systems Group. Its activities include the manufacture of electrical equipment, including transformers, cables, and harnesses, for integration into the production of diagnostic medical equipment.

Hazardous wastes are generated through the contamination of solvents used for cleaning varnished components, removing varnish residues, washing cable hardware and general metal degreasing. General Electric has applied for a Hazardous Waste Storage Permit which, if issued, would allow the company to accumulate up to eight 55-gallon drums of hazardous waste. The drums would be stored inside a designated building on a sealed concrete pad with a secondary containment system which has sufficient capacity to contain more than the total volume of the drums.

B. PERMIT APPLICATION

The permit application cited herein is the January 20, 1984 permit application, as amended on May 7, 1984 and July 30, 1984.

C. PURPOSE OF THE PERMITTING PROCESS

The purpose of the permitting process is to afford the United States Environmental Protection Agency (U.S. EPA), interested citizens and other governmental agencies the opportunity to evaluate the ability of the applicant to comply with the applicable Hazardous Waste Management requirements under the Resource Conservation and Recovery Act (RCRA), as amended including the Hazardous and Solid Waste Amendments of 1984 (HSWA). The U.S. EPA is required to prepare a draft permit which sets forth in one concise document all the applicable requirements with which the Agency intends to require the Permittee to comply during the ten year duration of the permit.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 were enacted to modify RCRA. Under Section 206 of the Amendments pertaining to Section 3004 of Solid Waste Disposal Act, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or of hazardous constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit

It further requires that permits issued must contain schedules of compliance for corrective action, when such corrective action cannot be completed prior to the issuance of the permit, and assurances of financial responsibility for completing corrective action. The subject facility has certified to U.S. EPA of its finding that there have been no uncorrected releases or previous solid waste management units. Through this permitting process, U.S. EPA is giving citizens and other governmental agency the opportunity to comment to the above-mentioned certification of General Electric Company, Medical Systems Group.

D. PROCEDURES FOR REACHING A FINAL DECISION

Under Section 7004(b) of RCRA and 40 CFR 124.10, the public is given forty-five days to review the application and comment on the draft permit conditions prior to EPA taking any final permitting action on the application for a Hazardous Waste Management permit. The comment period will begin on the date of publication of the public notice in a major local newspaper of general circulation. When the Regional Administrator of the U.S. EPA makes his final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. If none of the comments received requested a change in the draft permit conditions the permit will become effective immediately upon issuance of the permit. If comments received during the comment period requested changes in the draft permit conditions then the final permit will become effective thirty (30) days after service of notice of the decision or at a later date if review is requested under 40 CFR §124.19.

The issuance of a Hazardous Waste Management Permit will be coordinated by both U.S. EPA and the Wisconsin Department of Natural Resources. At this time each Agency has regulations which require a permit to be issued for all facilities which treat, store, or dispose of hazardous waste. If the State receives Phase II interim authorization for the hazardous waste program, the State will assume the administration of the Federal hazardous waste permitting program and this permit.

E. BRIEF SUMMARY OF THE PERMIT CONDITIONS

This section provides a brief summary of the permit conditions in the draft permit. The column titled "Regulation" provides the regulatory authority for the permit condition specified in the column titled "Permit Condition."

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
I.	STANDARD CONDITIONS	
I.A	Effect of Permit	§270.4 & 270.30(g)
I.B	Permit Actions	§270.30(f), 270.41, §270.42, 270.43,
I.C	Severability	Standard Practice
I.D.1	Duty to Comply	§270.30(a)
I.D.2	Duty to Reapply	§270.30(b) & 270.10(h)
I.D.3	Permit Expiration	§270.51
I.D.4	Need to Halt or Reduce Activity not a Defense	§270.30(c)
I.D.5	Duty to Mitigate	§270.30(d)
I.D.6	Proper Operation and Maintenance	§270.30(e)
I.D.7	Duty to Provide Information	§270.30(h) & 264.74(a)
I.D.8	Inspection and Entry	§270.30(i)
I.D.9	Monitoring and Records	§270.30(j)
I.D.10	Reporting Planned Changes	§270.30(1)(1)
I.D.11	Certification of Construction or Modification	§270.30(1)(2)
I.D.12	Anticipated Noncompliance	§270.30(1)(2)
I.D.13	Transfer of Permits	§270.30(1)(3), 270.40 & 264.12(c)

I.D.14	Compliance Schedules	§270.30(1)(5) & 270.33
I.D.15	Twenty-four Hour Reporting	§270.30(1)(6) & 264.56(d), (i) & (j)
I.D.16	Other Noncompliance	§270.30(1)(10)
I.D.17	Other Information	§270.30(1)(11)
I.E.18	Submittal of Reports or Other Information	In Draft Permit
I.E	Signatory Requirement	§270.11 & 270.30(k)
I.F	Confidential Information	§270.12
I.G	Documents to be Submitted Prior to Operation	As Indicated in Draft Permit
I.H	Documents to be Maintained at Facility Site	§264.13(b), 264.15(d) §264.53(a), 264.112(a) §264.142(a), 264.73, §264.16(b)

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
II. GENERAL FACILITY CONDITIONS		
II.A	Design and Operation of Facility	§264.31
II.B	Required Notice	§264.12
II.C	General Waste Analysis	§264.13
II.D	Security	§264.14
II.E	General Inspection Requirements	§264.15
II.F	Personnel Training	§264.16
II.G	General Requirements for Ignitable, Reactive and Incompatible Waste	§264.17
II.H	Location Standards	§264.18
II.I.1	Required Equipment	§264.32
II.I.2	Testing and Maintenance of Equipment	§264.33
II.I.3	Access to Communications or Alarm System	§264.34
II.I.4	Required Aisle Space	§264.35
II.I.5	Local Authorities	§264.37
II.J.1	Implementation of Contingency Plan	§264.51
II.J.2	Copies of the Contingency Plan	§264.53
II.J.3	Amendments to the Contingency Plan	§264.54
II.J.4	Emergency Coordinator	§264.55
II.K	Manifest System	§264.71, §264.72, §264.76, §270.30(1)(7), & HSWA

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
II.L.1	Operating Record	§264.73
II.L.2	Biennial Report	§264.75, §270.30(1)(9)
II.M.1	Closure Performance Standard	§264.111
II.M.2	Amendment to Closure Plan	§264.112(b)
II.M.3	Notification of Closure	§264.112(c)
II.M.4	Time Allowed for Closure	§264.113
II.M.5	Disposal or Decontamination of Equipment	§264.114
II.M.6	Certification of Closure	§264.115
II.N	Closure Cost Estimate	§264.142
II.O	Financial Assurance for Facility Closure	§264.143
II.P	Liability Requirements	§264.147
II.Q	Incapacity of Owners or Operators, Generators or Financial Institutions	§264.148
II.R	Waste Minimization Plan	§264.73(b)(9)

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
III. STORAGE IN CONTAINERS		
III.A	Waste Identification	§264.112(a)(2)
III.B	Condition of Containers	§264.171
III.C	Compatibility of Wastes with Containers	§264.172
III.D	Management of Containers	§264.173
III.E	Containment	§264.175
III.F	Special Requirements for Ignitable or Reactive Waste	§264.176
III.G	Special Requirements for Incompatible Waste	§264.177

Kearney

MANAGEMENT CONSULTANTS

A. T. KEARNEY, INC.

699 PRINCE STREET/P.O. BOX 1405
ALEXANDRIA, VIRGINIA 22313
703/836-6210
TELEX 248243ATKW UR

Mr. Rick Karl
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

October 22, 1984

Reference: EPA Contract No. 68-01-6515; Work Assignment
R05-007-10; Statement of Basis for General Electric
Co. Medical Systems Group, EPA ID No. WID 00 080 8725

Dear Rick:

Enclosed please find the Statement of Basis for the General Electric Company Medical Systems Group facility, which was inadvertently omitted from the package forwarded to you on October 3rd.

Sincerely,

Kay Holub Breeden

Kay Holub Breeden
Manager

cc: G. Phillips, EPA Region V
J. Grieve
D. Beasley

189-14

STATEMENT OF BASIS

General Electric Company,
Medical Systems Group - Milwaukee, Wisconsin

WID000808725

This is a statement of the basis for the Draft Hazardous Waste Permit for the subject facility. It briefly describes the derivation of the conditions of the draft permit and the reasons for them. Under 40 CFR §124.7 (Title 40 of the Code of Federal Regulations Section 124.7), the Statement of Basis is sent to the applicant and to any other person who requests it.

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I.D.7	Duty to Provide Information	\$270.30(h) & 264.74(a)
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I.D.11	Certification of Construction or Modification	\$270.30(1)(2)
I.D.12	Anticipated Noncompliance	\$270.30(1)(2)
I.D.13	Transfer of Permits	\$270.30(1)(3), 270.40 & 264.12(c)

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II.K	Manifest System	\$264.71, \$264.72, \$264.76, \$270.30(1)(7), \$270.30(1)(8)

II.L.1	Operating Record	\$264.73
II.L.2	Biennial Report	\$264.75, \$270.30(1)(9)
II.M.1	Closure Performance Standard	\$264.111
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II.M.6	Certification of Closure	\$264.115
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II.P	Liability Requirements	\$264.147
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III.F	Special Requirements for Ignitable Waste	\$264.176
III.G	Special Requirements for Incompatible Waste	\$264.177

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V
HAZARDOUS WASTE MANAGEMENT PERMIT

Name of Permittee: General Electric Company Medical Systems Group
Facility Location: 315 W. Edgerton Avenue, Milwaukee, Wisconsin
EPA Identification Number: WID 000-808-725
Effective Date: 30 days after service of notice of decision
Expiration Date: This permit shall have ten years duration.

Authorized Activities

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC., §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (U.S. EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to General Electric Company Medical Systems Group (hereafter called the Permittee), to operate a hazardous waste storage facility located in Milwaukee, Wisconsin at latitude 42° 56' 12" and longitude 87° 55' 00". You are authorized to conduct the following hazardous waste management activities:

<input checked="" type="checkbox"/> Storage	<input type="checkbox"/> Treatment	<input type="checkbox"/> Disposal
<input checked="" type="checkbox"/> Container	<input type="checkbox"/> Tank	<input type="checkbox"/> Injection Well
<input type="checkbox"/> Tank	<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Landfill
<input type="checkbox"/> Waste Pile	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Land Application
<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Other (Detonation)	<input type="checkbox"/> Surface Impoundment

Applicable Regulations:

The conditions of this permit were developed in accordance with the applicable provisions of 40 CFR Part:

<input checked="" type="checkbox"/> 261	<input checked="" type="checkbox"/> 264, Subpart G	<input type="checkbox"/> 264, Subpart L
<input checked="" type="checkbox"/> 262	<input checked="" type="checkbox"/> 264, Subpart H	<input type="checkbox"/> 264, Subpart M
<input checked="" type="checkbox"/> 264, Subparts A-E	<input checked="" type="checkbox"/> 264, Subpart I	<input type="checkbox"/> 264, Subpart N
<input type="checkbox"/> 264, Subpart F	<input type="checkbox"/> 264, Subpart J	<input type="checkbox"/> 264, Subpart O
<input checked="" type="checkbox"/> HSWA	<input type="checkbox"/> 264, Subpart K	<input checked="" type="checkbox"/> 270

Permit Approval:

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit and relevant provisions of HSWA. Applicable regulations are those which are in effect on the date of issuance of this permit (see 40 CFR §270.32(c)).

This permit is based on the assumption that the information submitted in the final permit application attached to the Permittee's letter dated January 20, 1984, and any subsequent amendments (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.42 and §270.43) and potential enforcement action. The Permittee must inform U.S. EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to modify RCRA. Under Section 206 of the Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Based on information submitted by Permittee on June 7, 1985, and subsequent review of such information by the State of Wisconsin and U.S. EPA, it has been established that the Permittee has not released hazardous constituents from any solid waste management unit to the environment.

Issued this _____ day of _____

by _____
Basil G. Constantelos, Director
Waste Management Division

PERMIT INDEX

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I. STANDARD CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit or the RCRA regulations including Hazardous and Solid Waste Amendments of 1984 (HSWA) is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any action brought under Section 3013, 3008(h) or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 9606 (a), commonly known as CERCLA), or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. This permit may also be reviewed and modified at any time by the U.S. EPA with consideration of improvements in the state of control and measurement technology and to include any terms and conditions as determined necessary to protect human health and the environment pursuant to RCRA 3005 (c)(3). The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action; permit termination, revocation and reissuance, modification; or denial of a permit renewal application, or other appropriate action.
2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires, unless permission for a later date has been granted by the Regional Administrator.

3. Permit Expiration. The duration of this permit shall be ten years from the effective date of the permit, in conformance with the provisions of 40 CFR 270.50. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR 270.13 - 270.29) and through no fault of the Permittee the Regional Administrator has not issued a new permit as set forth in 40 CFR 270.51.
4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.
6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.
7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and re-issuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.
8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:
 - (a) Enter at reasonable times upon the Permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- (d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

- (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, Second Edition, U.S. EPA, Standard Methods of Wastewater Analysis, EPA-600/4-79-020, U.S. EPA, or an equivalent method as specified in the attached Waste Analysis Plan.
- (b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- (c) Records of monitoring information shall specify:
 - (i) The dates, exact place, and times of sampling or measurements;
 - (ii) The individuals who performed the sampling or measurements;
 - (iii) The dates analyses were performed;
 - (iv) The individuals who performed the analyses;
 - (v) The analytical techniques or methods used; and
 - (vi) The results of such analyses.

10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.

11. Certification of Construction or Modification. The Permittee will not be commencing any new construction or modifications to the hazardous waste storage areas. Therefore, this section does not apply.

12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 270.41(b)(2) or 270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264, 270 and all applicable corrective action requirements.
14. Compliance Schedule. The Permittee will not be under any compliance schedules at permit issuance.
15. Twenty-four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:
 - (a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.
 - (b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
 - (i) Name, address, and telephone number of the owner or operator;
 - (ii) Name, address, and telephone number of the facility;
 - (iii) Date, time, and type of incident;
 - (iv) Name and quantity of materials involved;
 - (v) The extent of injuries, if any;
 - (vi) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
 - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is

expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

16. Other Noncompliance. The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports, as required by this permit are submitted. The reports shall contain the information listed in condition I.D.15.
17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.
18. Submittal of Reports or Other Information. All reports or other information required to be submitted by the terms of his permit shall be sent to:

RCRA Activities
U.S. EPA, Region V
P.O. Box A3587 - Chicago, IL 60690-3587

E. SIGNATORY REQUIREMENT.

All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR 270.11.

F. CONFIDENTIAL INFORMATION.

The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR 270.12.

G. DOCUMENTS TO BE SUBMITTED PRIOR TO OPERATION.

This requirement does not apply.

H. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE.

The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

- (1) Waste analysis plan as required by 40 CFR 264.13 and this permit.
- (2) Inspection schedules as required by 40 CFR 264.15(b) and this permit.
- (3) Contingency plan as required by 40 CFR 264.53(a) and this permit.
- (4) Closure plan as required by 40 CFR 264.112(a) and this permit.

- (5) Cost estimate for facility closure as required by 40 CFR 264.142(d) and this permit.
- (6) Operating record as required by 40 CFR 264.73 and this permit.
- (7) Personnel training documents and records as required by 40 CFR 264.15(d) and this permit.

II. GENERAL FACILITY CONDITIONS

A. DESIGN AND OPERATION OF FACILITY.

The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

B. REQUIRED NOTICE.

- (1) The Permittee shall notify the Regional Administrator in writing at least four weeks in advance of the date the Permittee expects to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source in the same calendar year is not required.
- (2) When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the generator in writing that he has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (See Condition II.L.1).

C. GENERAL WASTE ANALYSIS.

The Permittee shall follow the procedures described in the attached waste analysis plan, Attachment I.

D. SECURITY.

The Permittee shall comply with the security provisions of 40 CFR 264.14(b) and (c).

E. GENERAL INSPECTION REQUIREMENTS.

The Permittee shall follow the inspection schedule, Attachment II. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR 264.15(c). Records of inspections shall be kept as required by 40 CFR 265.15(d).

F. PERSONNEL TRAINING.

The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment III. The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).

G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee shall comply with the requirements of 40 CFR 264.17(a).

H. LOCATION STANDARDS. This requirement does not apply.

I. PREPAREDNESS AND PREVENTION.

1. Required Equipment. At a minimum, the Permittee shall contingency plan, Attachment IV as required by 40 CFR 264.32.
2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition as necessary to assure its proper operation in time of emergency.
3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR 264.34.
4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR 264.35.
5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR 264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

J. CONTINGENCY PLAN.

1. Implementation of Plan. The Permittee shall immediately carry out the provisions of the contingency plan, Attachment IV, and follow the emergency procedures described by 40 CFR 264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.
2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR 264.53.
3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 40 CFR 264.54.
4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator.

K. MANIFEST SYSTEM.

The Permittee shall comply with the manifest requirements of 40 CFR 264.71, 264.72, and 264.76, and 40 CFR 262 revised pursuant to HSWA.

L. RECORDKEEPING AND REPORTING.

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR 264.73(a), (b)(1), (2), (3), (4), (5), (6), and (9).

2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR 264.75 and 40 CFR 262.41.

M. CLOSURE.

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the closure plan, Attachment V.
2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR 264.112(b) whenever necessary.
3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date he expects to begin closure.
4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment V. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment V.
5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR 264.114 and the closure plan, Attachment V.
6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR 264.115.

N. COST ESTIMATE FOR FACILITY CLOSURE.

The Permittee's original closure cost estimate, prepared in accordance with 40 CFR 264.142(a), is specified in Attachment V.

1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR 264.142(b).
2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR 264.142(c).
3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR 264.142(d).

O. FINANCIAL ASSURANCE FOR FACILITY CLOSURE.

The Permittee shall demonstrate continuous compliance with 40 CFR 264.143 by providing documentation of financial assurance, as required by 40 CFR 264.151, in at least the amount of the

cost estimates required by permit condition II.N. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR 264.143.

P. LIABILITY REQUIREMENTS.

The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR 264.147 and the documentation requirements of 40 CFR 264.151, including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs.

Q. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS.

The Permittee shall comply with 40 CFR 264.148 whenever necessary.

R. WASTE MINIMIZATION.

The Permittee must certify, at least annually, that a program has been instituted to reduce the volume and toxicity of wastes generated pursuant to 40 CFR 264.73 (b)(9).

III. STORAGE IN CONTAINERS

A. WASTE IDENTIFICATION.

The Permittee may store a total volume of 440 gallons (8 @ 55-gallon drums) of the following wastes in containers at the facility, subject to the terms of this permit:

<u>Waste Type</u>	<u>Waste Code</u>
Spent varnish	D001
Spent 1, 1, 1-trichloroethane solvent	F001, F002
Spent methylene chloride solvent and trichloroethylene	F002
Mixed flammable non-chlorinated solvents including xylene, acetone, isopropyl and ethyl alcohol	F003

B. CONDITION OF CONTAINERS.

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.

C. COMPATIBILITY OF WASTE WITH CONTAINERS.

The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR 264.172.

D. MANAGEMENT OF CONTAINERS.

The Permittee shall manage the containers as required by 40 CFR 264.173 and Attachment VI.

E. CONTAINMENT.

The Permittee shall maintain the containment system in accordance with the requirements of 40 CFR 264.175 as specified in the attached plans and specifications, Attachment VII.

F. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE.

The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.

G. STORAGE OF HAZARDOUS WASTE PROHIBITED FROM LAND DISPOSAL.

Notwithstanding any other provision contained herein, the storage of any hazardous waste which is prohibited from one or more methods of land disposal under Section 3004 of RCRA or regulations promulgated thereunder, is strictly prohibited, except such storage as is solely for the purpose of accumulating quantities of such wastes as are necessary to facilitate proper recovery, treatment or disposal.

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT I
Waste Analysis Plan

General Electric Company Medical
Systems Group
315 W. Edgerton Avenue
Milwaukee, Wisconsin

U.S. EPA ID#: WID 000-808-725

ATTACHMENT I

Waste Analysis Plan

I.1 General

The waste analysis plan shall include sampling, testing, and evaluating the wastes stored at the General Electric Medical System Electrical Components Plant to assure that sufficient information is available for their safe handling and storage, thereby reducing the potential hazards to human health and the environment.

I.2 Chemical & Physical Analyses

All hazardous wastes shall be stored in 55 gallon containers and shall be sampled for chemical and physical analyses in accordance with the frequency of analysis as hereinafter stipulated. The analytical techniques used for waste analysis shall include, but not be limited to, gas chromatography, gas chromatography/mass spectroscopy, high performance liquid chromatography, and atomic absorption.

Specific chemical analyses shall be conducted utilizing test methods outlined in the EPA document entitled: Test Methods for Evaluating Solid Waste, Physical/Chemical Methods published by U.S. EPA Office of Water and Waste Management, Washington, DC, 1980.

I.3 Frequency of Analysis and Sampling Methods

Samples shall be taken and analyzed whenever (1) production processes or material changes suggest a possible change in waste chemical composition, or (2) positive waste identification cannot be made for no obvious reasons. Analyses and their results shall be completed prior to the shipment of wastes by the licensed transporter contracted with the facility for off-site disposal. At a minimum, wastes shall be analyzed annually to reassure their chemical and physical properties.

Grab samples shall be collected from 55 gallon storage containers using a ColiWasa sampler. Specific sampling methods shall be as described in Samplers and Sampling Procedures for Hazardous Waste Streams, U.S. EPA 600/2-80-018, January, 1980.

I.4 Parameters

At a minimum, the following chemical parameters shall be used for waste analyses.

1, 1, 1 - trichloroethane = $C_2H_3Cl_3$, pH
Methylene chloride = CH_2Cl_2 , pH
Spent Varnish = Flashpoint
Mixed Flammable Solvent = Flashpoint, xylene, acetone,
alcohol

Other parameters shall be added as appropriate.

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT II
Inspection Schedule

General Electric Company Medical
Systems Group
315 W. Edgerton Avenue
Milwaukee, Wisconsin

U.S. EPA ID#: WID 000-808-725

ATTACHMENT II

General Inspection Requirements

II.1 General

Routine inspections shall be conducted to assure the integrity of the storage containers, structural supports, containment, and other appurtenances so that the hazardous waste facility can be maintained in a secure and safe condition.

II.2 Frequency of Inspection

The frequencies of inspection on various equipment shall be as follows:

<u>Item</u>	<u>Minimum Frequency of Inspection</u>
1. Container storage area	Weekly
2. Fire extinguishers	Monthly
3. Doors	Weekly
4. PA System	Yearly
5. Trough gates & room exhaust	Yearly
6. Drum mover	Yearly
7. Loading & Unloading area	Daily
8. Containment tank	Yearly
9. Spill control equipment	Semi-annually
10. Warning signs	Semi-annually
11. Collection tank alarm & monitoring well	Yearly

All other equipment or items not listed above shall be inspected as required to ensure safety of the facility and to eliminate the hazards to protect human health and the environment.

II.3 Inspection and Personal Protection

Any unsafe condition observed during the inspection shall be corrected immediately to mitigate the hazard condition. Inspections shall be conducted by persons who have been trained for the specific inspection assigned. Equipment maintenance and inspection shall be performed by suppliers' representative.

Proper precautions shall be taken by persons conducting inspection or cleanup which would include the use of safety equipment for personal protection. Any spills shall be cleaned in an expeditious manner. The cleanups shall be properly disposed of in accordance with applicable regulations.

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT III
Personnel Training Plan

General Electric Company Medical
Systems Group
315 W. Edgerton Avenue
Milwaukee, Wisconsin

U.S. EPA ID#: WID 000-808-725

ATTACHMENT III Personnel Training

III. 1 General

All hazardous waste handler shall be trained for safe handling of these wastes. A job safety analysis (JSA) shall be prepared which describe basic safety precautions needed to perform the job properly, thereby reducing the hazard potential associated with the handling and storage of hazardous wastes.

In addition, the training shall provide personnel with basic skills to response to emergencies, to conduct safety inspection, and to maintain the security of the storage facility.

III. 2 Training Program

The training program shall include, but not be limited to, the following:

- (1) Review of RCRA hazardous waste disposal regulations
- (2) Review of the necessary elements of a plant hazardous waste procedure
- (3) Inspection of hazardous waste area
- (4) In-plant emergency communication
- (5) Emergency procedures
- (6) Inspection, repairing, and replacing facility emergency and monitoring equipment
- (7) Plant personnel training
- (8) Training deadlines
- (9) Training records

III.3 Personnel Training

The personnel training shall be designed to ensure that all persons involved in the treatment, storage, and disposal of hazardous waste, as well as well as persons involved in support activities. The content of the training program shall include:

- A. Response to Emergencies
 1. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
 2. Key parameters for automatic waste feed cutoff systems
 3. Communications or alarm systems operation.
 4. Response to fires or explosions
 5. Response to groundwater contamination incidents
 6. Shutdown operations
- B. Routine Operator Training
 1. Safe and proper operating procedures for the routine handling, storage, treatment, and disposal of specific hazardous wastes
 2. Selection and use of protective clothing and equipment
 3. Important properties (chemical, physical, toxicological) of the hazardous wastes handled, and special hazards and precautions:

Reactivity
Flammability

Corrosivity
Toxicity

Incompatibility

ATTACHMENT III (page 2)

4. Release prevention and response
5. Decontamination procedures
6. Facility operation and maintenance
7. Recordkeeping and reporting

III. 4 Teaching Methods

1. On-the-job training
2. Lectures (classroom), audio and visual aids
3. Discussion groups
4. Simulations, scenarios, drills
5. Seminars and courses, including programmed instruction

III. 5 Levels of Training

1. Broad, general instruction, e.g., top management
2. Broad, detailed instruction for key environmental personnel, e.g., environmental coordinator or specialist, manager of engineering.
3. Limited but detailed instruction for operators, as appropriate for their assigned duties

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT IV
Contingency Plan

General Electric Company Medical
Systems Group
315 W. Edgerton Avenue
Milwaukee, Wisconsin

U.S. EPA ID#: WID 000-808-725

ATTACHMENT IV

Contingency Plan

IV.1 General

The Permittee shall maintain a contingency plan, pursuant to 40 CFR 122.25(a)(7) and 264 Subpart D, to ensure that hazardous waste facilities have established the necessary planned procedures to follow in the event an emergency situation arises, and designed and equipped to minimize the possibility of accidents.

The Contingency Plan (chapter G) submitted as part of Part B application shall be implemented by the Permittee and shall be made part of these permit conditions. The following are the synopsis of the Contingency Plan.

IV.2 Facility Location & Physical Facilities

General Electric Medical Systems
Electical Coponents Plant
315 West Edgerton Avenue
Milwaukee, WI 53207

Drum storage capacity:

8 @ 55 gallon container
1 @ 5,000 gallon spill collection tank
26'X 38' storage area with 12"X4" deep
drain troughs

IV.3 Implementation

The contingency plan shall be implemented in the following situation

1. Fire and/or explosion
2. Spills or material release
3. Drills

IV.4 Emergency Response Procedures

1. Notification
2. Indentification of hazardous wastes
3. Assessment
4. Control procedures
 - a. Spill countermeasure responsibility
 - b. Spill inside hazardous waste storage area
 - c. Spill inside 315 W. Edgerton Avenue property
 - d. Material spill to sanitary or storm sewer
 - e. Spill outside of building
 - f. Fire and/or explosion

(cont) Attach: IV

5. Prevention of recurrence or spread of fires, explosions or releases
6. Leaking containers

IV.5 Emergency Equipment and Contacts

1. Sprinklers
2. Fire Extinguishers
3. Spill control equipment
4. Outside contractors and Fire Department

IV.6 Evacuation Plan

The plants internal alarm shall be sounded in the event that evacuation from the plant is required. Area evacuation monitors shall ensure that all employees are safely evacuated from the plant.

IV.7 Required Reports

After any event requiring implementation of the contingency plan, the Group Environmental Coordinator shall be notified within 12 hours and a complete written report turned in to him within 5 working days by the emergency coordinator. The Group Environmental Coordinator shall in turn submit the required reports to the local, state and federal agencies. The form to be used for reporting of an event shall be General Electric Policy and Procedure Number M206.000 dated 4/8/84.

The contingency plan shall be reviewed and immediately amended whenever:

1. Facility permit is revised
2. The plan fails in emergency
3. Facility changes
4. Emergency coordinators change
5. Emergency equipment changes

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT V
Closure Plan

General Electric Company Medical
Systems Group
315 W. Edgerton Avenue
Milwaukee, Wisconsin

U.S. EPA ID#: WID 000-808-725

ATTACHMENT V

V.1 General

The General Electric Company shall close the hazardous waste storage facility at 315 W. Edgerton Avenue, Milwaukee, Wisconsin, in a manner that eliminates the need for further maintenance and all threats to human health and the environment, including the threat of post-closure escape of the hazardous waste, rainfall or groundwater contamination of the atmosphere.

V.2 Closure Plan

1. Closure Performance Standard

Following cleaning of the facility after removal of all remaining hazardous waste and the removal of all cleaning materials employed, the performance of this cleaning operation shall be audited by sampling any soil or other materials which could have been contaminated by the handling of hazardous waste for analysis to ascertain complete removal.

2. Maximum Waste Inventory in Storage During Life of Facility

Anticipated usage levels and removal schedules indicate that there shall never be more than 8, 55-gallon drums of hazardous waste in storage at any one time.

3. Procedures for Inventory Removal and Decontamination

Final dispositions of remaining inventory shall consist of having the contract hauler remove all filled and partially filled drums remaining. Following checking the outdoor collection tank for drainage and removal and disposal of any found, decontamination shall consist of washing the facility with detergent and water. Since the same drainage system is used for the entire "Oil House" facility, decontamination shall include washing all of the peripheral collection troughs, the drain line to the collection tank, and the collection tank itself. The washings shall be disposed of as hazardous waste through the services of the same contract hauler involved in inventory removal. Any equipment involved in handling the hazardous waste shall be decontaminated in a similar manner to the facility itself.

4. Final Closure Schedule

- a. A closure plan shall be submitted to the Regional Administrator 180 days before closure.
- b. On the day plant production is discontinued permanently, the facility shall stop accepting hazardous waste for storage.
- c. Within 90 days, the waste inventory shall be disposed of in the manner indicated above.
- d. Within 120 days after discontinuing hazardous waste storage, the facility and any equipment involved shall be decontaminated.
- e. Within 150 days after discontinuing hazardous waste storage, the facility shall be closed.

(cont) Attach: V

- f. When closure is completed, both the Operator and the independent Registered Professional Engineer shall certify that the facility has been closed in accordance with the specifications in the closure plan. The independent Registered Professional Engineer shall also certify that he is familiar with the facility, that the closure plan exhibits good engineering practice, and that he has examined the final disposition manifest forms.

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT VI
Container Management Practices

General Electric Company Medical
Systems Group
315 W. Edgerton Avenue
Milwaukee, Wisconsin

U.S. EPA ID#: WID 000-808-725

ATTACHMENT VI

Management of Containers

VI.1 General

The Permittee shall transfer the hazardous waste from the container, which is not in good condition or begins to leak, to a container that is in good condition or manage the waste in some other way that complies with the requirements hereinafter specified.

Container in good condition shall mean there is no severe rusting, apparent structural defects, sign of leakage, or other unusual conditions.

VI.2 Storage Capacity

All hazardous wastes shall be stored in 55 gallon containers. The maximum inventory containers in storage at any given time during the operating life of this facility shall not exceed 8 drums. The containers shall be stored in areas located inside of the facility and labeled Oil House.

VI.3 Container Management Practice

Containers stored in the Oil House shall be stored closed. Containers shall be sealed immediately after hazardous material is added. All containers in the waste storage facility shall be labeled in accordance with EPA and DOT regulations for marking, describing the contents as Hazardous Waste Liquid. Each container label shall also indicate the date the first waste was placed in the container. The containers shall be placed on pallets within the facility to elevate them from any possible standing liquids. The containers shall not be stacked higher than 8 feet (2 drum high).

Adequate aisle space shall be maintained at all times for ingress and egress of mobile equipment and for fire fighting equipment. Containers and the storage area shall be inspected in accordance with Attachment II.

Containers shall be handled by a hand operated drum mover by persons who have received proper instruction and training per Attachment III.

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT VII
Containment

General Electric Company Medical
Systems Group
315 W. Edgerton Avenue
Milwaukee, Wisconsin

U.S. EPA ID#: WID 000-808-725

ATTACHMENT VII

Containment

VII.1 General

The hazardous waste storage area shall be part of the "Oil House" facility, which is used for storage and dispensing of flammable liquid as well as storage of hazardous wastes. The Oil House facility shall be completely encompassed by perimeter drain troughs covered with steel grating. These troughs shall be pitched to a slope of 1/4" per foot and shall drain liquid through a pipe constructed of ductile iron to a 5000 gallon capacity underground collection tank of steel construction.

VII.2 Requirements for The Base & Contain Liquids

The containers storage area shall have concrete floor without cracks or seams and shall be water tight construction. The floor shall be designed for a maximum loading of 3000 psi. The floor shall be sealed with a sealer to prevent absorption of hazardous wastes should spill occur.

The collection tank shall be externally coated and provided with cathodic protection to minimize the tank corrosion. In the event of tank leakage or spillage, all drained material shall be collected in the peripheral troughs and drain pipes to the underground collection tank.

VII.3 Containment (collection) Tank & Operation

The 5000 gallon underground storage tank shall be constructed with an 8" diameter bottom sump provided with a float-switch set to sound an alarm in the building, just outside the Oil House, whenever there is a 2" or more liquid in the sump. A monitoring well shall be installed near the tank for detection of tank leakage. Tank alarm and monitoring well shall be inspected as described in Attachment II.

When the alarm is sounded, the Environmental Engineer or his delegate shall be notified. They shall activate the emergency procedure for a hazardous waste spill, per Attachment IV. As a part of spill procedure, the collected hazardous waste shall be pumped from the collection tank into 55 gallon containers for storage in the Oil House. The content of the containers shall be analyzed and shipped off-site for disposal.

HAZARDOUS WASTE MANAGEMENT PERMIT

ATTACHMENT VIII
Procedures for Handling Ignitable Waste

General Electric Company Medical
Systems Group
315 W. Edgerton Avenue
Milwaukee, Wisconsin

U.S. EPA ID#: WID 000-808-725

ATTACHMENT VIII

Container Handling Ignitable Waste

VIII.1 General

The purpose of this Attachment is to ensure the safe handling of ignitable wastes, realizing the flammable nature of the waste that could lead to fire and explosion hazards. In addition, fire fighting equipment shall be readily available at locations where ignitable wastes are handled and/or stored.

VIII.2 Compliance with Codes

Management of containers handling ignitable waste shall conform to the requirements set forth by local fire code, National Fire Prevention Association Code, and good engineering practice.

Ignitable waste storage area shall be classified as Class I, Division I for the purpose of hazard classification. Equipment employed for the storage and handling of containers containing ignitable hazardous waste shall be explosion proof and shall be UL stamped.

VIII.3 Handling of Containers

Spark proof tools shall be utilized for all containers storing ignitable waste. Warning label shall be used for each ignitable waste container. Warning signs shall be posted in the storage area. All signs shall be visible for a distance of 25 feet and shall be OSHA approved.

Extreme care shall be exercised for the handling of the containers to avoid spill or ignition of the waste.

VIII.4 Security

The entire Oil House shall be locked at all times when there is no one working inside the storage area. During those hours of the day and during those days of the week when the entire facility is shutdown, plant signal system monitoring service shall be provided by Central Control Alarm Corporation, which provides response in the event a signal is received from the following:

- Door contact switches
- Motion detectors
- Fire sensors
- Waterflow switches
- Valve switches
- Low temperature sensors
- Manual fire-alarm pull station

No smoking or welding shall be permitted inside the storage room, loading/unloading areas, and the passage way between the loading/unloading area and the storage area.

(cont) Attach: VIII

VIII.5 Fire Fighting Equipment

Fire extinguishers shall be strategically located where ignitable waste containers may be present. Fire suppressant shall be compatible with the waste and shall be effective in suppressing fire.

The facility shall be equipped with standpipe, fire hose, and other appropriate fire fighting equipment. Water pressure shall be maintained at all time for all fire hydrants and standpipe.

STATEMENT OF BASIS
GENERAL ELECTRIC COMPANY
MEDICAL SYSTEMS GROUP - MILWAUKEE, WISCONSIN

WID006078141

This is a statement of the basis for the Draft Hazardous Waste Permit for the subject facility. It presents the rationale of the conditions contained in this draft permit. Under 40 CFR 124.7 (Title 40 of the Code of Federal Regulations, Section 124.7), the Statement of Basis is sent to the applicant and to any other person who requests it.

A. FACILITY DESCRIPTION

The General Electric Company Medical Systems Group Electrical Shop is located at 315 W. Edgerton Avenue within the city limits of Milwaukee, Wisconsin. This facility is one of the subassembly manufacturing installations of the Medical Systems Group. Its activities include the manufacture of electrical equipment, including transformers, cables, and harnesses, for integration into the production of diagnostic medical equipment.

Hazardous wastes are generated through the contamination of solvents used for cleaning varnished components, removing varnish residues, washing cable hardware and general metal degreasing. General Electric has applied for a Hazardous Waste Storage Permit which, if issued, would allow the company to accumulate up to eight 55-gallon drums of hazardous waste. The drums would be stored inside a designated building on a sealed concrete pad with a secondary containment system which has sufficient capacity to contain more than the total volume of the drums.

B. PERMIT APPLICATION

The permit application cited herein is the January 20, 1984 permit application, as amended on May 7, 1984 and July 30, 1984.

C. PURPOSE OF THE PERMITTING PROCESS

The purpose of the permitting process is to afford the United States Environmental Protection Agency (U.S. EPA), interested citizens and other governmental agencies the opportunity to evaluate the ability of the applicant to comply with the applicable Hazardous Waste Management requirements under the Resource Conservation and Recovery Act (RCRA), as amended including the Hazardous and Solid Waste Amendments of 1984 (HSWA). The U.S. EPA is required to prepare a draft permit which sets forth in one concise document all the applicable requirements with which the Agency intends to require the Permittee to comply during the ten year duration of the permit.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 were enacted to modify RCRA. Under Section 206 of the Amendments pertaining to Section 3004 of Solid Waste Disposal Act, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or of hazardous constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit

It further requires that permits issued must contain schedules of compliance for corrective action, when such corrective action cannot be completed prior to the issuance of the permit, and assurances of financial responsibility for completing corrective action. The subject facility has certified to U.S. EPA of its finding that there have been no uncorrected releases or previous solid waste management units. Through this permitting process, U.S. EPA is giving citizens and other governmental agency the opportunity to comment to the above-mentioned certification of General Electric Company, Medical Systems Group.

D. PROCEDURES FOR REACHING A FINAL DECISION

Under Section 7004(b) of RCRA and 40 CFR 124.10, the public is given forty-five days to review the application and comment on the draft permit conditions prior to EPA taking any final permitting action on the application for a Hazardous Waste Management permit. The comment period will begin on the date of publication of the public notice in a major local newspaper of general circulation. When the Regional Administrator of the U.S. EPA makes his final permit decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. If none of the comments received requested a change in the draft permit conditions the permit will become effective immediately upon issuance of the permit. If comments received during the comment period requested changes in the draft permit conditions then the final permit will become effective thirty (30) days after service of notice of the decision or at a later date if review is requested under 40 CFR §124.19.

The issuance of a Hazardous Waste Management Permit will be coordinated by both U.S. EPA and the Wisconsin Department of Natural Resources. At this time each Agency has regulations which require a permit to be issued for all facilities which treat, store, or dispose of hazardous waste. If the State receives Phase II interim authorization for the hazardous waste program, the State will assume the administration of the Federal hazardous waste permitting program and this permit.

E. BRIEF SUMMARY OF THE PERMIT CONDITIONS

This section provides a brief summary of the permit conditions in the draft permit. The column titled "Regulation" provides the regulatory authority for the permit condition specified in the column titled "Permit Condition."

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
I.	STANDARD CONDITIONS	
I.A	Effect of Permit	§270.4 & 270.30(g)
I.B	Permit Actions	§270.30(f), 270.41, §270.42, 270.43,
I.C	Severability	Standard Practice
I.D.1	Duty to Comply	§270.30(a)
I.D.2	Duty to Reapply	§270.30(b) & 270.10(h)
I.D.3	Permit Expiration	§270.51
I.D.4	Need to Halt or Reduce Activity not a Defense	§270.30(c)
I.D.5	Duty to Mitigate	§270.30(d)
I.D.6	Proper Operation and Maintenance	§270.30(e)
I.D.7	Duty to Provide Information	§270.30(h) & 264.74(a)
I.D.8	Inspection and Entry	§270.30(i)
I.D.9	Monitoring and Records	§270.30(j)
I.D.10	Reporting Planned Changes	§270.30(1)(1)
I.D.11	Certification of Construction or Modification	§270.30(1)(2)
I.D.12	Anticipated Noncompliance	§270.30(1)(2)
I.D.13	Transfer of Permits	§270.30(1)(3), 270.40 & 264.12(c)

I.D.14	Compliance Schedules	§270.30(1)(5) & 270.33
I.D.15	Twenty-four Hour Reporting	§270.30(1)(6) & 264.56(d), (i) & (j)
I.D.16	Other Noncompliance	§270.30(1)(10)
I.D.17	Other Information	§270.30(1)(11)
I.E.18	Submittal of Reports or Other Information	In Draft Permit
I.E	Signatory Requirement	§270.11 & 270.30(k)
I.F	Confidential Information	§270.12
I.G	Documents to be Submitted Prior to Operation	As Indicated in Draft Permit
I.H	Documents to be Maintained at Facility Site	§264.13(b), 264.15(d) §264.53(a), 264.112(a) §264.142(a), 264.73, §264.16(b)

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
II. GENERAL FACILITY CONDITIONS		
II.A	Design and Operation of Facility	§264.31
II.B	Required Notice	§264.12
II.C	General Waste Analysis	§264.13
II.D	Security	§264.14
II.E	General Inspection Requirements	§264.15
II.F	Personnel Training	§264.16
II.G	General Requirements for Ignitable, Reactive and Incompatible Waste	§264.17
II.H	Location Standards	§264.18
II.I.1	Required Equipment	§264.32
II.I.2	Testing and Maintenance of Equipment	§264.33
II.I.3	Access to Communications or Alarm System	§264.34
II.I.4	Required Aisle Space	§264.35
II.I.5	Local Authorities	§264.37
II.J.1	Implementation of Contingency Plan	§264.51
II.J.2	Copies of the Contingency Plan	§264.53
II.J.3	Amendments to the Contingency Plan	§264.54
II.J.4	Emergency Coordinator	§264.55
II.K	Manifest System	§264.71, §264.72, §264.76, §270.30(1)(7), & HSWA

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
II.L.1	Operating Record	§264.73
II.L.2	Biennial Report	§264.75, §270.30(1)(9)
II.M.1	Closure Performance Standard	§264.111
II.M.2	Amendment to Closure Plan	§264.112(b)
II.M.3	Notification of Closure	§264.112(c)
II.M.4	Time Allowed for Closure	§264.113
II.M.5	Disposal or Decontamination of Equipment	§264.114
II.M.6	Certification of Closure	§264.115
II.N	Closure Cost Estimate	§264.142
II.O	Financial Assurance for Facility Closure	§264.143
II.P	Liability Requirements	§264.147
II.Q	Incapacity of Owners or Operators, Generators or Financial Institutions	§264.148
II.R	Waste Minimization Plan	§264.73(b)(9)

<u>Permit Condition</u>	<u>Subject</u>	<u>Regulation (40 CFR)</u>
III. STORAGE IN CONTAINERS		
III.A	Waste Identification	§264.112(a)(2)
III.B	Condition of Containers	§264.171
III.C	Compatibility of Wastes with Containers	§264.172
III.D	Management of Containers	§264.173
III.E	Containment	§264.175
III.F	Special Requirements for Ignitable or Reactive Waste	§264.176
III.G	Special Requirements for Incompatible Waste	§264.177

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

Name of Permittee: General Electric Company Medical Systems Group

Facility Location: 315 W. Edgerton Avenue, Milwaukee, Wisconsin

EPA Identification Number: WID 00 080 8725

Effective Date: _____

Expiration Date: _____

Authorized Activities

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC §6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (U.S. EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations), a permit is issued to General Electric Company Medical Systems Group (hereafter called the Permittee), to operate a hazardous waste storage facility located in Milwaukee, Wisconsin at latitude 42° 56' 12" and longitude 87° 55' 00". You are authorized to conduct the following hazardous waste management activities:

<u>X</u> Storage	_____ Treatment	_____ Disposal
<u>X</u> Container	_____ Tank	_____ Injection Well
_____ Tank	_____ Surface Impoundment	_____ Landfill
_____ Waste Pile	_____ Incinerator	_____ Land Application
_____ Surface Impoundment	_____ Other	_____ Ocean Disposal
		_____ Surface Impoundment

Applicable Regulations

The conditions of this permit were developed in accordance with the applicable provisions of 40 CFR Part:

<u>X</u> 261	<u>X</u> 264, Subpart G	_____ 264, Subpart L
<u>X</u> 262	<u>X</u> 264, Subpart H	_____ 264, Subpart M
<u>X</u> 264, Subparts A-E	<u>X</u> 264, Subpart I	_____ 264, Subpart N
_____ 264, Subpart F	_____ 264, Subpart J	_____ 264, Subpart O
	_____ 264, Subpart K	<u>X</u> 270

Permit Approval

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260 through 264 and 270 and 124 as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit [see 40 CFR §270.32(c)].

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated January 20, 1984 and any subsequent amendments (hereafter referred to as the application) is accurate and that the facility will be constructed and operated as specified in the application. Any inaccuracies found in this information may be grounds for the termination or modification of this permit (see 40 CFR §270.42 and §270.43) and potential enforcement action. The Permittee must inform U.S. EPA of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is effective as of _____, and shall remain in effect until _____, unless revoked and reissued, or terminated (40 CFR §270.41 and .43) or continued in accordance with 40 CFR §270.51.

Issued this _____ day of _____

by _____
Basil G. Constantelos, Director
Waste Management Division

I. STANDARD CONDITIONS

A. EFFECT OF PERMIT

The Permittee is allowed to store hazardous waste in accordance with the conditions of this permit. Any storage of hazardous waste not authorized in this permit or the RCRA regulations is prohibited. Compliance with this permit constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 [42 U.S.C. 9606(a), commonly known as CERCLA], or any other law providing for protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such non-compliance is authorized by an emergency permit. Any permit non-compliance, other than noncompliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action; permit termination, revocation and reissuance, modification; or denial of a permit renewal application, or other appropriate action.

2. Duty to Reapply. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee shall submit a complete application for a new permit at least 180 days before this permit expires, unless permission for a later date has been granted by the Regional Administrator.
3. Permit Expiration. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 40 CFR 270.13-270.29) and through no fault of the Permittee the Regional Administrator has not issued a new permit as set forth in 40 CFR 270.51.
4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
5. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.
6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory, and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of the permit.
7. Duty to Provide Information. The Permittee shall furnish to the Regional Administrator, within a reasonable time, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this permit.
8. Inspection and Entry. The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

- (a) Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- (d) Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by RCRA, any substances or parameters at any location.

9. Monitoring and Records.

- (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, July, 1982; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, March, 1979; or an equivalent method as specified in the attached Waste Analysis Plan.
- (b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

(c) Records for monitoring information shall include:

- (i) The date(s), exact place, method, and times of sampling or measurements;
- (ii) The individual(s) who performed the sampling or measurements;
- (iii) The date(s) analyses were performed;
- (iv) The individual(s) who performed the analyses;
- (v) The analytical technique(s) or method(s) used; and
- (vi) The result(s) of such analyses.

10. Reporting Planned Changes. The Permittee shall give notice to the Regional Administrator as soon as possible of any planned physical alterations or additions to the permitted facility.
11. Certification of Construction or Modification. The Permittee will not be commencing any new construction or modifications to the hazardous waste storage area. Therefore, this section does not apply.
12. Anticipated Noncompliance. The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Such notice does not constitute a waiver of the Permittee's duty to comply with permit requirements.
13. Transfer of Permits. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 270.41(b)(2) or 270.42(d). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264 and 270.
14. Compliance Schedule. The Permittee will not be under any compliance schedules at permit issuance.
15. Twenty-Four Hour Reporting. The Permittee shall report to the Regional Administrator any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

- (a) Information concerning the release of any hazardous waste which may endanger public drinking water supplies.
- (b) Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
 - (i) Name, address, and telephone number of the owner or operator;
 - (ii) Name, address, and telephone number of the facility;
 - (iii) Date, time, and type of incident;
 - (iv) Name and quantity of materials involved;
 - (v) The extent of injuries, if any;
 - (vi) An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
 - (vii) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee need not comply with the five day written notice requirement if the Regional Administrator waives the requirement and the Permittee submits a written report within fifteen days of the time the Permittee becomes aware of the circumstances.

16. Other Noncompliance. The Permittee shall report all instances of noncompliance not otherwise required to be reported under Condition I.D.15., at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in Condition I.D.15.

17. Other Information. Whenever the Permittee becomes aware that he failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Regional Administrator, the Permittee shall promptly submit such facts or information.
18. Submittal of Reports or Other Information. All reports or other information required to be submitted by the terms of this permit shall be sent to:

RCRA Activities
U.S. EPA, Region V
P. O. Box A3587
Chicago, Illinois 60690-3587

- E. Signatory Requirement. All reports or other information requested by the Regional Administrator shall be signed and certified as required by 40 CFR 270.11.
- F. Confidential Information. The Permittee may claim confidential any information required to be submitted by this permit in accordance with 40 CFR 270.12.
- G. Documents To Be Submitted Prior to Operation. This requirement does not apply.
- H. Documents To Be Maintained at Facility Site. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:
- (1) Waste analysis plan as required by 40 CFR 264.13 and this permit.
 - (2) Personnel training documents and records as required by 40 CFR 264.16(d) and this permit.
 - (3) Contingency plan as required by 40 CFR 264.53(a) and this permit.
 - (4) Closure plan as required by 40 CFR 264.112(a) and this permit.
 - (5) Cost estimate for facility closure as required by 40 CFR 264.142(d) and this permit.
 - (6) Operating record as required by 40 CFR 264.73 and this permit.
 - (7) Inspection schedules as required by 40 CFR 264.15(b) and this permit.

II. GENERAL FACILITY CONDITIONS

- A. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.
- B. Required Notice.
- (1) The Permittee shall notify the Regional Administrator in writing at least four weeks in advance of the date the Permittee expects to receive hazardous waste from a foreign source. Notice of subsequent shipments of the same waste having the same EPA hazardous waste number from the same foreign source is not required.
 - (2) When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), it must inform the generator in writing that it has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (See Condition II.L.1).
- C. General Waste Analysis. The Permittee shall comply with the procedures described in the attached waste analysis plan, Attachment I.
- D. Security. The Permittee shall comply with the security provisions of 40 CFR 264.14(b) and (c).
- E. General Inspection Requirements. The Permittee shall follow the inspection schedule, Attachment II. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 40 CFR 264.15(c). Records of inspections shall be kept as required by 40 CFR 264.15(d).

- F. Personnel Training. The Permittee shall conduct personnel training as required by 40 CFR 264.16. This training program shall follow the attached outline, Attachment III. The Permittee shall maintain training documents and records as required by 40 CFR 264.16(d) and (e).
- G. General Requirements for Ignitable, Reactive, or Incompatible Waste. The Permittee shall comply with the requirements of 40 CFR 264.17(a).
- H. Location Standards. This requirement does not apply.
- I. Preparedness and Prevention.
1. Required Equipment. The Permittee shall equip the facility with the equipment set forth in the contingency plan, Attachment IV, as required by 40 CFR 264.32.
 2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in Condition II.I.1 as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities are set forth in the inspection schedule, Attachment II.
 3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR 264.34.
 4. Required Aisle Space. The Permittee shall maintain aisle space as required by 40 CFR 264.35.
 5. Arrangements with Local Authorities. The Permittee shall attempt to make arrangements with State and local authorities as required by 40 CFR 264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.
- J. Contingency Plan.
1. Implementation of Plan. The Permittee shall immediately comply with the provisions of the contingency plan, Attachment IV, and follow the emergency procedures described by 40 CFR 264.56 whenever there is a fire, explosion, or release of hazardous waste or constituents which threatens or could threaten human health or the environment.

2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR 264.53.
 3. Amendments to Contingency Plan. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 40 CFR 264.54.
 4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator.
- K. Manifest System. The manifest requirements of 40 CFR 264.71, 264.72, and 264.76 do not apply.
- L. Recordkeeping and Reporting.
1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR 264.73(a), (b)(1), (2), (3), (4), (5), (6), and (8).
 2. Biennial Report. The Permittee shall comply with the biennial report requirements of 40 CFR 264.75.
- M. Closure.
1. Performance Standard. The Permittee shall close the facility as required by 40 CFR 264.111 and in accordance with the closure plan, Attachment V.
 2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 40 CFR 264.112(b) whenever necessary.
 3. Notification of Closure. The Permittee shall notify the Regional Administrator at least 180 days prior to the date it expects to begin closure.
 4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Attachment V. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the closure plan, Attachment V.

5. Disposal and/or Decontamination of Equipment. When closure is completed, the Permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR 264.114 and the closure plan, Attachment V.
 6. Certification of Closure. When closure is completed, the Permittee shall certify to the Regional Administrator that the facility has been closed in accordance with the specifications in the closure plan as required by 40 CFR 264.115.
- N. Cost Estimate for Facility Closure. The Permittee's original closure cost estimate, prepared in accordance with 40 CFR 264.142(a), is specified in Attachment V.
1. The Permittee must adjust the closure cost estimate for inflation within 30 days after each anniversary of the date on which the first closure cost estimate was prepared, as required by 40 CFR 264.142(b).
 2. The Permittee must revise the closure cost estimate whenever there is a change in the facility's closure plan as required by 40 CFR 264.142(c).
 3. The Permittee must keep at the facility the latest closure cost estimate as required by 40 CFR 264.142(d).
- O. Financial Assurance for Facility Closure. The Permittee shall demonstrate continuous compliance with 40 CFR 264.143 by providing documentation of financial assurance, as required by 40 CFR 264.151, in at least the amount of the cost estimates required by permit condition II.N. Changes in financial assurance mechanisms must be approved by the Regional Administrator pursuant to 40 CFR 264.143.
- P. Liability Requirements. The Permittee shall demonstrate continuous compliance with the requirements of 40 CFR 264.147 and the documentation requirements of 40 CFR 264.151, including the requirements to have and maintain liability coverage for sudden and accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs.
- Q. Incapacity of Owners or Operators, Guarantors, or Financial Institutions. The Permittee shall comply with 40 CFR 264.148 whenever necessary.

III. STORAGE IN CONTAINERS

- A. Waste Identification. The Permittee may store a total volume of 440 gallons of the following wastes in containers at the facility, subject to the terms of this permit:

<u>Waste Description</u>	<u>Waste Code</u>
Spent varnish	D001
Spent 1,1,1-trichloroethane solvent	F001, F002
Spent methylene chloride solvent	F002
Mixed flammable non-chlorinated solvents including xylene, acetone, and isopropyl alcohol	F003

- B. Condition of Containers. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.
- C. Compatibility of Waste with Containers. The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 40 CFR 264.172.
- D. Management of Containers. The Permittee shall manage the containers as required by 40 CFR 264.173 and the container management practices in Attachment VI.
- E. Containment. The Permittee shall maintain the containment system in accordance with the requirements of 40 CFR 264.175 as specified in the attached plans and specifications, Attachment VII.
- F. Special Requirements for Ignitable Waste. The Permittee shall not locate containers holding ignitable waste within 15 meters (50 feet) of the facility's property line. The Permittee shall handle containers of ignitable waste in accordance with the procedures in Attachment VIII.
- G. Special Requirements for Incompatible Waste. The Permittee is not authorized to store incompatible waste unless a permit modification is granted by the Regional Administrator.

LIST OF ATTACHMENTS

- I. Waste Analysis Plan
- II. Inspection Schedule
- III. Training Outline
- IV. Contingency Plan
- V. Closure Plan
- VI. Container Management Practices
- VII. Plans and Specifications
- VIII. Procedures for Handling Ignitable Wastes

ATTACHMENT I

WASTE ANALYSIS PLAN

C-2 Waste Analysis Plan (40 CFR 122.25 [a] [3])

C-2-a Purpose, Parameters and Rationale

This section describes the procedures which will be followed in order to obtain a detailed chemical and physical analysis of a representative sample of the waste.

Table 1 lists the hazardous wastes stored at the Electrical Components facility, their analytical parameter, and the rationale for the analytical parameter.

C-2-b Test Methods

Table II shows the test methods that are used to measure analytical parameters.

C-2-c Sampling Methods

Grab samples are collected from 55 gallon drums using a coliwasa sampler. The specific procedure for sampling is outlined in the EPA document: Samplers and Sampling Procedures For Hazardous Waste Streams (U.S. EPA - 600/2-80-018, January, 1980, page 36).

C-2-d Frequency of Analysis

It is anticipated that waste materials will be picked up by the licensed transporter contracting for this service at approximately monthly intervals. Properly identified drums of waste designated for pick up will be sampled in advance of the pick up date by the independent laboratory involved. This analysis will be carried out whenever production process or material changes suggest a possible change in waste composition. At a minimum wastes will be analyzed yearly.

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TABLE 1
PARAMETERS AND RATIONALE FOR THEIR SELECTION

<u>Hazardous Waste</u>	<u>Parameter</u>	<u>Rationale</u>
1,1,1-trichloroethane	Organic solvent: $\text{C}_2\text{H}_3\text{Cl}_3$ pH	This is a listed toxic waste F001, F002
Methylene Chloride	Organic solvent: CH_2Cl_2 pH	This is a listed toxic waste F002
Spent Varnish	Flashpoint	This waste is ignitable with a low flashpoint.
Mixed Flammable Solvent	Flashpoint xylene, acetone, alcohol	This is an ignitable mixture with a low flashpoint. F001 and D001

Table II

Parameters and Test Methods

<u>Parameters</u>	<u>Test Method</u>	<u>Reference</u>
1,1,1-trichloroethane	GC/MS	Method 8240(1)
Methylene Chloride	GC/MS	Method 8240(1)
Xylene	GC/MS	Method 8020(1)
Acetone	GC/MS	Method 8270(1)
Flash Point	Pensky-Martens closed cup	ASTM D-93-79 or D-93-80
pH	Electrometric	Method 9040(1)

NOTE:

- (1) Test Method for Evaluating Solid Waste, Physical/Chemical Methods, 2nd Edition, U.S. EPA, July 1982, SW-846.

ATTACHMENT II

INSPECTION SCHEDULE

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F-2 Inspection Schedule

F-2-a General Inspection Requirements

The Electrical Components facility conducts regular inspections of the facility for equipment malfunctions, structural deterioration, and operator errors that could possibly lead to a hazardous waste spill or be considered an unsafe condition.

Figure -
2a (2) Frequency of Inspection

The types of problems anticipated and the frequency of inspection are identified as follows:

Under the terms of its contract, the organization providing general security services will maintain the equipment it installs and monitors. The collection tank alarm system will be checked by the maintenance department, under the supervision of the Maintenance Supervisor.

The container storage area for hazardous wastes will be inspected on a weekly basis.

These weekly inspections will also take note of such unsafe conditions as container placement restricting aisle space, damaged pallets, wet or damaged floors, general housekeeping, and the condition of warning signs.

An outside contractor checks fire extinguishers monthly and maintains them.

Doors will be checked at the time of weekly inspection to ascertain that they are lockable, are locked at the time of inspection, and that the fusible links are intact.

More specific details on inspection frequency are listed as follows:

In accordance with 40 CFR 264.15 requirements and Wisconsin NR 181 regulations, Electrical Components will adhere to the following waste storage area inspection schedule:

The PA system and alarms will be tested yearly. Trough gates and the room exhaust system will be inspected yearly. The drum mover will be inspected yearly.

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Loading and Unloading Areas

Loading and unloading areas and other areas that are subject to spills will be inspected daily when in use. Spills will be cleaned up in an expeditious manner when detected. (Reference Policy and Procedure M205.000).

Container Storage Areas

Container storage areas will be inspected at least weekly. The following types of problems will be investigated during inspections.

- leaking drums
- deteriorating drums
- drums without EPA/DOT labels
- fires, smoldering drums, or drums with abnormally high temperatures
- other problems

Damaged and deteriorating drums are illustrated in Appendix E.

Containment and Cleanup Equipment

The containment tank will be inspected annually to insure that there are no leaks or other forms of deterioration that would prohibit proper containment.

Spill control equipment will also be inspected semi-annually to insure proper function.

Security Devices

Door locks will be inspected weekly to insure that unauthorized personnel cannot enter the facility.

Warning signs will be inspected semi-annually to establish the fact that they are not damaged or weather worn.

Fire Extinguishing Equipment

Fire fighting equipment will be inspected monthly according to instructions outlined in the Electrical Components Plant Property Conservation Manual.

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General

Any deterioration or malfunction of equipment or structures noted during the inspection will be remedied on a schedule which insures that the problem does not lead to an environmental or health hazard. Where a hazard is imminent or has already occurred, remedial action will be taken immediately.

Inspection Records

Each inspection will be recorded in inspection logs (Figures 10, 10a, 10b, 10c, 10d). Inspection logs will be maintained for three years from the date of inspection.

TOXIC AND HAZARDOUS WASTE

Facility Name _____

Facility Location

SECTION DATE	TIME OF INSPECTION	GENERAL CONDITION OF DRUMS		LEAKS		COMMENTS	DATE AND NATURE OF REPAIRS	INSPECTOR'S NAME
		GOOD	POOR	YES	NO			

Figure 10

F-7

FIRE EXTINGUISHING EQUIPMENT

Facility Name _____

Location _____

[illegible]

CONTAINMENT AND CLEAN-UP EQUIPMENT

Facility Name _____

Location _____

Inspection Date	Time of Inspection	Condition of Tank		Condition of Equipment*		Comments	Date and Nature of Repairs	Inspector
		Good	Poor	Good	Poor			
F-9								Figure 10b

* INCLUDING: Squeegees, absorbant material, and back-up drum count.

SECURITY DEVICES

Facility Name _____

Location _____

[illegible]

CONTAINMENT AND CLEAN-UP EQUIPMENT

Facility Name _____

Location _____

Inspection Date	Time of Inspection	Condition of Dikes		Condition of Equipment		Comments	Date and Nature of Repairs	Inspector
		Good	Poor	Good	Poor			

F-11

Figure 10d

71-10000

Figure 10d

ATTACHMENT III

TRAINING OUTLINE

H

Personnel Training - Introductory and Continuing

H-1 Outline of Training Program

H-1-a Job Titles and Duties

All material handlers who handle hazardous waste will be trained in handling these wastes. Management responsibilities involving compliance with RCRA regulations, but not involving actual handling of the wastes, are split between the Environmental Representative and the Manager, Manufacturing Engineering and Facilities.

Other personnel are involved in generation of hazardous waste at this site or maintain equipment near hazardous waste, but none of these are directly involved in handling the hazardous material.

Since GE job titles are designed to meet the needs of the Personnel Department and do not necessarily define specific responsibilities of the individuals collecting, storing and disposing of hazardous waste, the Region V Office of the EPA has indicated that GE's JSA would meet the job description requirements.

A Job Safety Analysis (JSA) has been prepared for each job which describes the manner in which it is performed and the basic safety precautions needed to perform it properly (Appendix H). During each employee's annual review, the JSA's pertaining to his/her job are reviewed and signed. During group safety meetings, presentations on spill response and chemical safety are periodically shown to employees.

A discussion session usually follows to provide assurance that each employee understands his responsibilities and the procedure he is to follow during a hazardous waste emergency.

H-1-b Training Content, Frequency, and Technique

Appendix A is an outline of training provided for the plant environmental representative. Appendix B is the employee training program used at this facility. A review of the Contingency Plan (Section G) is a part of the employee training. Specific walk-through training is also employed. Any operator/handler is given hands-on training explaining the JSA during his annual review. Appendix I outlines training for fire brigade members.

H-1-c Training Director

General and preliminary training is done by the Environmental Representative. Ongoing training is provided by supervisors during the monthly safety/communications meeting and during the employee annual review. Details of the process manager's responsibilities and qualifications are given in Appendix C.

H-1-d Relevance of Training to Job Position

As described in H-1-b and H-1-c, different groups of employees receive different levels of training according to their job function.

H-1-e Training for Emergency Response

The Contingency Plan is included in the employee training package. It is also used in fire brigade and spill team training.

H-2 Implementation of Training Program

The Environmental Representative (emergency coordinator) and all current material handlers are being trained presently with the initial training program to be completed by May 19, 1984. After that date, all new personnel will complete this training program within six months of assignment to a material handling function, whether that person is a new employee or transfers into a material handling function from some other area of shop operations and whether or not there are immediate plans for involving him in hazardous waste handling.

No employee working in a hazardous waste handling function will handle hazardous waste unsupervised prior to completion of the training program.

Employees involved in handling hazardous waste are required to meet annually for review and update of this training program and to discuss and study the following subjects:

1. All hazardous wastes currently being handled at the facility, noting any changes in waste type, volume, source, characteristics, or location that have occurred during the past year.
2. The status of storage and operating conditions and procedures, noting any areas where there are problems or potential for problems. Employees participate in developing effective solutions.

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3. The requirements contained in the facility's RCRA permit, noting any changes that have occurred during the past year. Areas where maintenance of compliance is a problem are identified and discussed, and effective solutions are sought.
4. Incidents that have occurred in the past year that warranted use of contingency plans and/or emergency action. This review focuses on the cause of the incident and identification of steps to be taken to prevent or to ensure better handling of such events in the future.

Records documenting the job safety analysis for each position, job descriptions, names of employees, and completed training programs (both introductory and review) will be kept on-site in the facilities office of the electrical shop. These records will be kept until closure of the facility or for three years from the date of an individual employee's termination, whichever occurs first.

APPENDIX A

PLANT ENVIRONMENTAL REPRESENTATIVE'S
HAZARDOUS WASTE TRAINING

APPENDIX A

Plant Environmental Representative's Hazardous Waste Training

- I. Review of the RCRA Hazardous Waste Disposal Regulations
 - A. Definition of a hazardous waste
 - B. Waste analysis
 - C. Proper collection and storage of wastes
 - D. Waste manifests; manifest tracking
 - E. Recordkeeping
- II. A review of the necessary elements of a plant Hazardous Waste Procedure
- III. Inspection of Hazardous Waste Storage Area
 - A. When to inspect
 - B. What to look for
 - C. Corrective measures
 - D. Inspection log
- IV. In-Plant Emergency Communication
 - A. Telephones
 - B. Alarms
 - C. Other
- V. Emergency Procedures
 - A. Spills
 - 1) Containment
 - 2) Notification
 - 3) Cleanup
 - B. Fires
 - 1) Fire brigade activities
 - 2) Fire control equipment
 - 3) Notification
 - C. Other Emergencies
- VI. Inspection, repairing, and replacing facility emergency and monitoring equipment
- VII. Plant Personnel Training
 - A. Who to train
 - B. Contents of Training Program

VIII. Training Deadlines

- A. Training of new employees
- B. Yearly updates

IX. Training Records

APPENDIX B
PERSONNEL TRAINING
GENERAL

APPENDIX B

Personnel Training

I. Scope

The basic purpose of the personnel training requirement of RCRA is to ensure that all persons involved in the treatment, storage, and disposal of hazardous waste, as well as persons involved in support activities such as security, inspection, and response to emergencies, know how to perform their assigned duties properly and safely.

II. General Contents of a Training Program

A. Response to Emergencies (all six items required by EPA)

1. Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
2. Key parameters for automatic waste feed cutoff systems
3. Communications or alarm systems, operation and response to
4. Response to fires or explosions
5. Response to groundwater contamination incidents
6. Shutdown operations

B. Routine Operator Training

1. Safe and proper operating procedures for the routine handling, storage, treatment, and disposal of specific hazardous wastes
2. Selection and use of protective clothing and equipment
3. Important properties (chemical, physical, toxicological) of the hazardous wastes handled, and special hazards and precautions:

Reactivity	Corrosivity	Incompatibility
Flammability	Toxicity	

4. Release prevention and response
5. Decontamination procedures
6. Facility operation and maintenance
7. Recordkeeping and reporting

III. Appropriate Teaching Methods

1. On-the-job training
2. Lectures (classroom), audio and visual aids
3. Discussion groups
4. Simulations, scenarios, drills
5. Seminars and courses, including programmed instruction

IV. Levels of Training

1. Broad, general instruction, e.g., top management
2. Broad, detailed instruction for key environmental personnel, e.g., environmental coordinator or specialist, manager of engineering.
3. Limited but detailed instruction for operators, as appropriate for their assigned duties

**GENERAL ELECTRIC
MEDICAL SYSTEMS DIVISION
JOB SAFETY ANALYSIS**

PLAN

DEPARTMENT:

SHIFT:

NEW JOB FUNCTION:

☒ YES
☐ NO

JOB PERFORMED BY:

DATE:

PAGE 1 OF 8

JOB FUNCTION ANALYZED: **Collection and Disposal of Waste Materials**

KEY JOB STEPS	POTENTIAL SAFETY HAZARDS	RECOMMENDED SAFE JOB PROCEDURE AND PERSONAL PROTECTIVE EQUIPMENT
Chemical collection at worksite	Personal injury	Use properly labeled cans for the collection of waste chemicals. Do not mix waste materials!!
		Observe general condition and operation of all waste chemical storage cans
		If can does not close properly or is leaking, replace.
	Fire hazard	Use safety cans for flammable materials
		Avoid flames, sparks & excessive heat

NAME OF PERSON MAKING JOB SAFETY ANALYSIS _____ DATE _____

GENERAL ELECTRIC MEDICAL SYSTEMS DIVISION JOB SAFETY ANALYSIS	PLANT	NEW JOB FUNCTION: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
	DEPARTMENT:	JOB PERFORMED BY:	
	SHIFT:	DATE:	PAGE <u>3</u> OF <u>8</u>

JOB FUNCTION ANALYZED:
Collection and Disposal of Waste Materials (continued)

KEY JOB STEPS	POTENTIAL SAFETY HAZARDS	RECOMMENDED SAFE JOB PROCEDURE AND PERSONAL PROTECTIVE EQUIPMENT
	Fumes and vapors	Avoid prolonged breathing of chemical vapors.
		Keep containers covered when not in use.
	Solvent spills	Clean up minor spills promptly. Avoid skin contact. Avoid breathing vapor.
		Notify supervisor in the event of large spills.
Transportation of waste chemicals to 55 gallon accumulation drums.	Solvent spills	Transport container carefully and be aware of the fact that the waste chemical is splashing around during transport.
		Keep container closed during transportation

NAME OF PERSON MAKING JOB SAFETY ANALYSIS _____ DATE _____

GENERAL ELECTRIC MEDICAL SYSTEMS DIVISION JOB SAFETY ANALYSIS	PLANT:	NEW JOB FUNCTION: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
	DEPARTMENT:	JOB PERFORMED BY:	
	SHIFT:	DATE:	PAGE <u>4</u> OF <u>8</u>

JOB FUNCTION ANALYZED: **Collection and Disposal of Waste Materials (continued)**

KEY JOB STEPS	POTENTIAL SAFETY HAZARDS	RECOMMENDED SAFE JOB PROCEDURE AND PERSONAL PROTECTIVE EQUIPMENT
Transferring waste material from collection can to 55 gallon accumulation drum.	Personal injury	Do not mix waste materials. Chemical reactions may occur.
		Transfer chemical to properly labeled and dated 55 gallon drum. Notify your supervisor if the drum is not properly labeled and dated.
		Observe the general condition of the drum. If the container is leaking, notify your supervisor.
	Eye/Skin contact	Avoid skin contact. If chemicals are splashed on skin, wash with soap and large amounts of water. If chemicals are splashed in eyes, use an eye wash for 15-20 minutes. Notify your supervisor and report to the medical clinic.

NAME OF PERSON MAKING JOB SAFETY ANALYSIS _____ DATE _____

GENERAL ELECTRIC MEDICAL SYSTEMS DIVISION JOB SAFETY ANALYSIS	PLANT	NEW JOB FUNCTION: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
	DEPARTMENT:	JOB PERFORMED BY:	
	SHIFT:	DATE:	PAGE <u>5</u> OF <u>8</u>

JOB FUNCTION ANALYZED:

Collection and Disposal of Waste Materials (continued)

KEY JOB STEPS	POTENTIAL SAFETY HAZARDS	RECOMMENDED SAFE JOB PROCEDURE AND PERSONAL PROTECTIVE EQUIPMENT
		Wear personal protective equipment
		(rubber gloves, face shield or goggles,
		plastic apron).
	Fumes and vapors	Avoid prolonged breathing of chemical
		vapors.
		Drum must be stored closed when not
		in use.
	Chemical spills	Clean up minor spills promptly. Avoid
		breathing vapor. Notify supervisor in
		the event of large spills.
	Fire hazard	Drums for flammable materials must
		be grounded.

NAME OF PERSON MAKING JOB SAFETY ANALYSIS _____ DATE _____

GENERAL ELECTRIC MEDICAL SYSTEMS DIVISION JOB SAFETY ANALYSIS	PLANT	NEW JOB FUNCTION: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
	DEPARTMENT:	JOB PERFORMED BY:	
	SHIFT:	DATE:	PAGE <u>6</u> OF <u>8</u>

JOB FUNCTION ANALYZED:
Collection and Disposal of Waste Materials (continued)

KEY JOB STEPS	POTENTIAL SAFETY HAZARDS	RECOMMENDED SAFE JOB PROCEDURE AND PERSONAL PROTECTIVE EQUIPMENT
		Avoid flames, sparks, & excessive heat.
Movement of drums to drum storage area.	Lift truck breakdown	Check lift truck without load. Dead man throttle control automatic break function, and raise and lower switches.
	Collision./tripping. Movement of material on skids/pallets by industrial truck presents hazards with improper use of powered equipment. Load shifting and possible spillage occur with sudden stop of moving loads. Faulty pallets and collars allow shifting materials to escape and fall out of raised skid.	Move cautiously -- load properly secured and balanced. Watch for foot or mobile traffic. Keep load at safe height. Maintain unobstructed work areas while arranging materials. Report loads with faulty pallets/skids received in area.
	Improper manual lifting, shifting or	

NAME OF PERSON MAKING JOB SAFETY ANALYSIS _____

DATE _____

GENERAL ELECTRIC MEDICAL SYSTEMS DIVISION JOB SAFETY ANALYSIS	PLANT _____	NEW JOB FUNCTION: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
	DEPARTMENT: _____	JOB PERFORMED BY: _____	
	SHIFT: _____	DATE: _____	PAGE <u>7</u> OF <u>8</u>

JOB FUNCTION ANALYZED: Collection and Disposal of Waste Materials (continued)		
KEY JOB STEPS	POTENTIAL SAFETY HAZARDS	RECOMMENDED SAFE JOB PROCEDURE AND PERSONAL PROTECTIVE EQUIPMENT
	movement of parts/containers create condition for body strain.	
	Backing up with lift truck pinning body against object.	Move cautiously -- back up powered hand truck only when body is positioned to prevent entrapment.
	Equipment malfunction due to low battery condition	Do not operate side loader when equipment warning lights are on.
	Chemical spills	Report spill to supervisor. Contain spilled material refer to P&P 10.501X Spill Prevention and Control. Refer to P&P 10.504X Environmental Reporting.
	Fire hazards	Avoid flames, sparks and excessive heat.

NAME OF PERSON MAKING JOB SAFETY ANALYSIS _____	DATE _____
---	------------

**GENERAL ELECTRIC
MEDICAL SYSTEMS DIVISION
JOB SAFETY ANALYSIS**

PLANT _____

DEPARTMENT: _____

SHIFT: _____

NEW JOB FUNCTION: _____

YES
NO

JOB PERFORMED BY: _____

DATE: _____

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JOB FUNCTION ANALYZED: Collection and Disposal of Waste Material (continued)

KEY JOB STEPS	POTENTIAL SAFETY HAZARDS	RECOMMENDED SAFE JOB PROCEDURE AND PERSONAL PROTECTIVE EQUIPMENT
Final shipment of waste materials	Fire hazard	Avoid flames, sparks, and excessive heat.
	Fumes and vapors	Drums must be closed for loading and transportation.
	Personal injury	Observe the general condition of the drum. If the container is leaking, notify your supervisor. Reference --
		P&P 10.505X Solid and Liquid Waste Disposal.

NAME OF PERSON MAKING JOB SAFETY ANALYSIS _____ DATE _____

APPENDIX I

TRAINING FOR FIRE BRIGADE MEMBERS

B. Training Programs*

1. Training

- a. It is the policy of Medical Systems Group that Fire Brigades be limited to fighting incipient stage fires. Incipient stage fires are defined as fires that can be controlled or extinguished with portable fire extinguishers or 1-1/2 inch hose streams and without the use of self contained breathing apparatus or personal protective equipment.
- b. All members of the brigade shall receive hands-on training in the use of fire fighting apparatus or rescue apparatus provided by their plants program.
- c. All members shall be trained in the depth and purpose of the particular brigade.
- d. The training should include fire fighting such as with portable fire extinguishers, use of hose lines and nozzles, ventilation of buildings, salvage operations and rescue operations.
- e. The training should provide a means by which brigade members increase knowledge and develop skills to perform individually or as a team member of a brigade. Teamwork and skill are the backbone of the brigade.
- f. Training should be conducted and supervised by the public fire department, private consultant, or qualified brigade leader.
- g. Fire Brigade leaders shall receive more comprehensive training than the regular brigade members.
- h. A schedule of training shall be established such that all members are required to complete a specified program of instruction as a condition to membership in the brigade.
- i. Hands on training shall be provided annually to all active brigade members and records kept of attendance and subjects covered.

* Source: MSBG Property Conservation Manual

- j. A typical training program may include all or part of the following subjects:

Program Overview	Need for a trained brigade Classroom procedures Fireground procedures Fire Brigade response Multiple functions of a brigade member Communications
Plant Fire Brigade	Organizational make-up Leadership Response of brigade members
Basics of Fire Propagation and Behavior	Fire tetrahedron Stages of fire Spread of fire Methods of extinguishment Flammable liquid characteristics Any company hazardous material problems Classes of fire
Fire Prevention	Weekly inspections of all areas Evacuation drills Fire education systems for employees Maintaining good housekeeping Welding and cutting procedures program
Portable Extinguishers	Types and locations Discuss use of all portable extinguishers on Class A, B, C and D fires and provide hands-on practice
Hose and Hydrants	Locations in plant Discuss use of hose lines and nozzles and provide hands-on practice Discuss use of hydrants and provide hands-on practice Advantages of water Disadvantages of water Fire stream requirements Use of fog stream Flammable liquid fires Water and plant fire hazards Hose stream and electricity Hose stream and gas fires
Detection and Suppression Systems	Review and discuss fire detection systems Discuss water flow detection system Automatic sprinkler systems Discuss water supplies Deluge systems Foam/Water sprinklers

- Foam systems
 - Halon systems
 - Dry chemical systems
 - Carbon dioxide systems
 - Size up fire
 - Plan method of attack
 - Protection of exposures
 - Confinement
 - Extinguishment
 - Overhaul
- Ventilation What is ventilation
Reasons for ventilation
Decision to ventilate
Nature of smoke and gases
Fire control
Path of ventilation
Ventilation precautions
Ventilation problems
- Salvage What is salvage
Equipment available
When it should be done
What should be protected
How it should be protected
- Protective
Breathing
Apparatus
(Physical) What it is and its components
Correct use of breathing apparatus
Correct inspection and maintenance
after use
Discuss safety precautions
Discuss and practice emergency procedures
- Personal
Protective
Equipment For hostile environments as applicable
- k. A meeting report form shall be used to set forth training subjects, attendees, time, place, date, and discussions.
- l. Drills should be held as needed to check the ability of brigade members to perform the operations they are expected to carry out with the environment provided.
- m. At the conclusion of any drill, all equipment shall be promptly placed in readiness to respond to an actual fire call.

- n. A critique should follow each drill to fully discuss what happened to correct any flaws in procedures and to discover any area that may need additional training.

Fire brigade members that respond to spill situations will receive hands-on and classroom training on spill reporting, containment and clean-up.

ATTACHMENT I V

CONTINGENCY PLAN

Date: 7/30/84
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G

G

Contingency Plan

The information contained herein is submitted in accordance with the requirements for a contingency plan, as contained in 40 CFR 122.25 (a) (7) and 264 subpart D.

Contingency Plan (40 CFR 122.25 [a] [7])

The intent of 264, Subpart D (Contingency Plan and Emergency Procedures), of RCRA is to ensure that facilities that treat, store, or dispose of hazardous wastes have established the necessary planned procedures to follow in the event an emergency situation should arise.

The intent of the requirements under 40 CFR 264, Subpart C (Preparedness and Prevention), which was described in Section F, is to ensure that the facility is properly designed and equipped to minimize the possibility of accidents and prevent the occurrence of emergency situations. The requirements under 40 CFR 264 Subpart D address the actions that are to be taken if an accident should occur.

G-1 General Information

This contingency plan is for:

General Electric Medical Systems
Electrical Components Plant
315 W. Edgerton Avenue
Milwaukee, WI 53207

Spent chlorinated degreasing solvents (F001, F002), mixed flammable cleaning solvents (D001, F003), and waste varnish (D001) are stored at this facility.

G-1-a Physical Facilities

Drum storage facility, capacity 8 x 55 gallon drums. Spill collection tank, 5,000 gallon capacity.

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G-1-b Key Personnel

	<u>Home Phone Number</u>	<u>Work Phone Number</u>
J. Gutschenritter, Manager, Manufacturing Engineering & Facilities	691-9012	769-2782
Dennis M. Hussey, Group Environmental Coordinator	549-6709	544-3022
Donald J. Bernhardt, Environmental Representative	786-1579	769-2823
Tim M. Smith, Manager Electrical Component Manufacturing	544-0450	769-2780

The Emergency Coordinator is:

Don Bernhardt

Alternate Coordinators are:

J. Gutschenritter
T. Smith
D. Hussey

The primary Emergency Coordinator and Alternates have complete authority to commit all resources of the company in the event of an emergency.

G-3 Implementation Of The Contingency Plan

The decision to implement the contingency plan depends upon whether or not an imminent or actual incident could threaten human health or the environment. The purpose of this section is to provide guidance to the Emergency Coordinator in making this decision by providing decision-making criteria. The contingency plan will be implemented in the following situations:

1. Fire and/or Explosion
 - a. A fire causes the release of toxic fumes.
 - b. The fire spreads and could possibly ignite materials at other locations onsite or could cause heat-induced explosions.

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- c. The fire could possibly spread to offsite areas.
 - d. Use of water or water and chemical fire suppressant could result in contaminated runoff.
 - e. An imminent danger exists that an explosion could occur, causing a safety hazard because of flying fragments or shock waves.
 - f. An imminent danger exists that an explosion could occur, causing a safety hazard because of flying fragments or shock waves.
 - g. An imminent danger exists that an explosion could result in release of toxic material.
 - h. An explosion has occurred.
2. Spills or Material Release
- a. The spill could result in release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.
 - b. The spill could cause the release of toxic liquids or fumes.
 - c. The spill can be contained onsite, but the potential exists for ground water contamination.
3. Drills
- a. To insure plan works.
 - b. To sharpen skills.

G-4 Emergency Response Procedures

G-4-a Notification

In the event of an emergency situation, the Emergency Coordinator is to be notified. The Coordinator in turn will notify the appropriate people/organizations depending on the type of incident.

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G-4-b Identification of Hazardous Wastes

The emergency coordinator will immediately identify the character, exact source, amount and area extent of the release. The initial identification method will be to utilize visual analysis of the material and location of the release. The hazardous wastes stored in the facility include waste 1,1,1-trichloroethane, waste methylene, waste varnish, and a waste flammable solvent mixture (xylene, acetone, and isopropyl alcohol).

G-4-c Assessment

The Emergency Coordinator will assess possible hazards, both direct and indirect, to human health or the environment.

G-4-d Control Procedures

Potential accidents are either 1) spills or 2) fire and/or explosions. Natural disasters such as earthquakes or tornadoes are assumed to fall into one of these classifications.

Spill Countermeasure Responsibility
(Emergency Coordinator and Alternates)

1. Primary Responsibility: Environmental Representative.
2. Secondary: In the absence of the Environmental Representative, the Manager, Manufacturing Engineering and Facilities is responsible for taking spill countermeasures.
3. In the absence of both the Environmental Representative and the Manager, Manufacturing Engineering, the Manager, Electrical Component Manufacturing is responsible for taking spill countermeasures.
4. In the absence of all three of the above, the Group Environmental Coordinator assumes spill countermeasure responsibility.
5. In the event of a spill, the responsible person is to be notified so that he can take charge of any spill prevention and countermeasure efforts immediately, as well as any subsequent cleanup operations. This individual will also be responsible for all reporting covered in G-8.

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G

Spill Inside Hazardous Waste Storage Area

This area is designed for containment of small (1 or 2 gallons) spills of ignitable and otherwise hazardous materials. A 1,000 cfm exhaust unit with a non-spark wheel and explosion-proof motor is provided to furnish continuous ventilation for the Oil House. Following the procedure given below will assure minimizing hazards.

1. Close all doors of the Hazardous Waste Storage Facility to minimize the effect that vapors may have on other parts of the plant.
2. Squeegee any material which has not already drained to the outdoor collection tank or been picked up by absorbent material into the peripheral throughs and into the tank. Clean-up and containment equipment is located in the Maintenance Department (see Figure 10e and Figure 10f).
3. For removal of collected material from the tank, call AAA Environmental Industries, Inc., 541-1440.
4. Report the spill to the individuals listed under G-4-d.

(For Large Spills An Outside Contractor And/Or The Fire Department Will Be Contacted).

Spill Inside 315 W. Edgerton Avenue

No Flow to Sewer

1. Contact the first available individual listed under G-4-d to enable him to determine whether or not any evacuation is in order.
2. For small spills: using whatever absorbant mats and bulk materials are on the premises, confine and absorb the spilled material.
3. Place the absorbants containing the spilled materials in gasketed-cover 55-gallon steel open-top drums, label the drums, and store them in the hazardous waste facility.

(For Large Spills An Outside Contractor And/Or The Fire Department Will Be Contacted).

Material Spill to Sanitary or Storm Sewer

1. Contact the first available individual listed under G-4-d to enable him to determine whether or not any evacuation is in order.

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2. The Emergency Coordinator or his alternate shall:
 - 2a. If spilled material is flammable, contact the Milwaukee Fire Department: 347-2323.
 - 2b. Contact the following:

Sanitary Sewer: Phone 482-2040; Milwaukee Metropolitan Sewerage District
Phone 291-3165: U.S. Coast Guard

Storm Sewer: Phone (608) 266-3232; Wisconsin Office of Emergency Government
Phone 291-3165; U.S. Coast Guard
 - 2c. Using whatever absorbant mats and bulk materials which are on the premises, confine and absorb the spilled materials.
 - 2d. Place the absorbants contaminated with spilled materials in gasketed-cover 55-gallon steel open-top drums, label the drums and store them in the hazardous waste facility.

Spill Outside of Building

1. Contact the first available individual listed under G-4-d.
2. The Emergency Coordinator or his alternate shall:
 - 2a. If required, barricade spill area to minimize danger to general public.
 - 2b. Contact the following:

Material on paved area, with no drainage to storm sewer or soil: If spilled material is flammable, phone Milwaukee Fire Department: 347-2323.

Flow to Soil or Storm Sewer: In addition to Milwaukee Fire Department, phone Wisconsin Office of Emergency Government: (608) 266-3232. If storm sewer, also phone U.S. Coast Guard: 291-3165.

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- 2c. Using whatever absorbant mats and bulk materials which are on the premises, confine and absorb the spilled materials.
- 2d. Place the absorbants contaminated with spilled materials in gasketed-cover 55-gallon steel open-top drums, label the drums and store them in the hazardous waste facility.

Fire and/or Explosion

The first line of defense against fire and/or explosion is our Fire Brigade. It is called into action by an announcement over the building's public address system. At the scene, the incident will be contained or extinguished under the direction of the Fire Brigade Chief, who also determines the need or absence of need for assistance from outside sources. If outside assistance is required, the Fire Brigade Chief transfers his authority to the West Milwaukee Fire Chief upon his arrival. Property conservation is second in priority only to personnel safety, and the Fire Brigade Chief will act according to this philosophy.

The following actions will always be performed:

- 1. The electrician will secure power to affected area.
- 2. Each Fire Brigade member bring a full CO₂ extinguisher to the designated scene.
- 3. Hazardous waste storage areas will be vacated and secured if they are not the the scene of the incident.
- 4. Employees not actively involved in the emergency action effort will be cleared from the affected area or evacuated from the building.
- 5. If any injuries occur, the injured person(s) will be removed from the scene to a safe area and medical treatment will be administered by qualified personnel.

In the event of a flammable material spill, the Emergency Coordinator will announce no smoking or open flames, and evacuation of the building or affected area. The electrician will secure power to the affected area. The Fire Brigade will respond as if it were a fire, bringing appropriate equipment. The spill team will also respond to:

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1. Contain the leak.
2. If the spill is small: (1 or 2 gallons) Clean up the spill.
For large spills, outside assistance will be requested.
3. Ventilate the area to eliminate an explosion hazard.

In the event of a non-flammable spill, the same action would be implemented with the exception of the activities of the electrician and fire brigade.

Plant evacuation is an integral part of the Property Conservation/Security Manual. The Evacuation Plan and Evacuation Procedures are contained in this manual.

G-4-e Prevention of Recurrence or Spread of Fires, Explosions or Releases

A complete review of a spill or fire incident will be conducted in order to identify the cause of the incident and methods to prevent similar incidents. Additional controls identified in the report will be implemented to mitigate future incident potential.

The waste storage area is designed to eliminate the possibility of spread of fires or spills beyond the storage area.

G-4-i Leaking Containers

In the event that a container is determined to be leaking, the remedy will be to pump the contents of the leaking drum into an empty drum.

G-5 Emergency Equipment

The Oil House is equipped with sprinklers for fire control. Immediately outside the door of the Oil House is a fire extinguisher. Spill control equipment is located in the Maintenance Department.

Incompatible Wastes

There are no incompatible wastes stored at this facility.

Post-Emergency Equipment Maintenance

After an emergency event, all emergency equipment will be reoutfitted to original condition. An inspection of all safety equipment will be implemented before resumption of operations. The Group Safety and Environmental Coordinators will be notified that equipment has been restored and that operations are resuming.

Container Spills and Leakage

Refer to Section G-4d for explanation of response to container spills and leaks.

Tank Spills and Leakage

There are no tanks at this facility normally used to store hazardous waste

Waste Piles

This facility does not presently have a hazardous waste pile.

G-6 Coordination Agreements

General Electric Electrical Components facility has made working agreements with the following organizations:

1. City of Milwaukee Fire Department for emergency fire and medical assistance.
2. Hydrite Chemical Company
2655 N. Mayfair Road
Milwaukee, WI 53226
Contact Person: Donna Weinstock 257-2300
For emergency removal of hazardous waste collected from the hazardous waste spill tank.
3. West Allis Memorial
Emergency Room
Notified of types of hazardous wastes we have so they can know what to expect in a medical emergency.

If in the event of a spill, additional absorbant materials are required, call vendors such as the WESO Corporation, Phone: 352-9532. On weekends or nights call 628-1983, 442-1860, or 442-5586.

If cleanup of contaminated soil is required, AAA Environmental Industries, Inc., Phone 541-1760 will be called.

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G-7 Evacuation Plan

The plant's internal alarm will be sounded in the event that evacuation from the plant is required. The Evacuation Maps are contained in Figure 11.

Area evacuation monitors will ensure that all employees are safely evacuated from the plant.

G-8 Required Reports

After any event requiring implementation of the contingency plan, the Group Environmental Coordinator will be notified within 12 hours and a complete written report turned in to him within five working days by the emergency coordinator. The Group Environmental Coordinator will in turn submit the required reports to the local, state and federal agencies. The form to be used for reporting of an event will be General Electric Policy and Procedure Number M206.000 dated 4/8/84.

Amendments to the Contingency Plan: The contingency plan will be reviewed and immediately amended, if necessary, whenever:

1. The facility permit is revised.
2. The plan fails in an emergency.
3. The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes in the response necessary in any emergency.
4. The list of Emergency Coordinators change.
5. The list of emergency equipment changes.

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Information to be given when calling Milwaukee Fire Department, the Wisconsin Office of Emergency Government, the Milwaukee Metropolitan Sewerage District, or the U.S. Coast Guard:

1. Company name and location.
2. Name of person reporting, title, and phone number.
3. Location of spill.
4. Material spilled.
5. Estimated quantity.
6. Action taken for containment and cleanup.
7. Any sewers involved.

DEPT

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EMERGENCY RESPONSE EQUIPMENT LIST

Containment Equipment

1. Containment tanks
2. Tank alarm
3. Trough gates

Clean-up Equipment

1. Employee personal protection equipment (rubber gloves, chemical aprons, chemical goggles).
2. Absorbant material
3. Brooms and squeegees

Fire Equipment

1. Extinguishers
2. Sprinklers
3. Automatic fire alarms

Communication Equipment

1. PA system
2. Telephones

Miscellaneous Equipment:

1. Drum mover

Figure 11

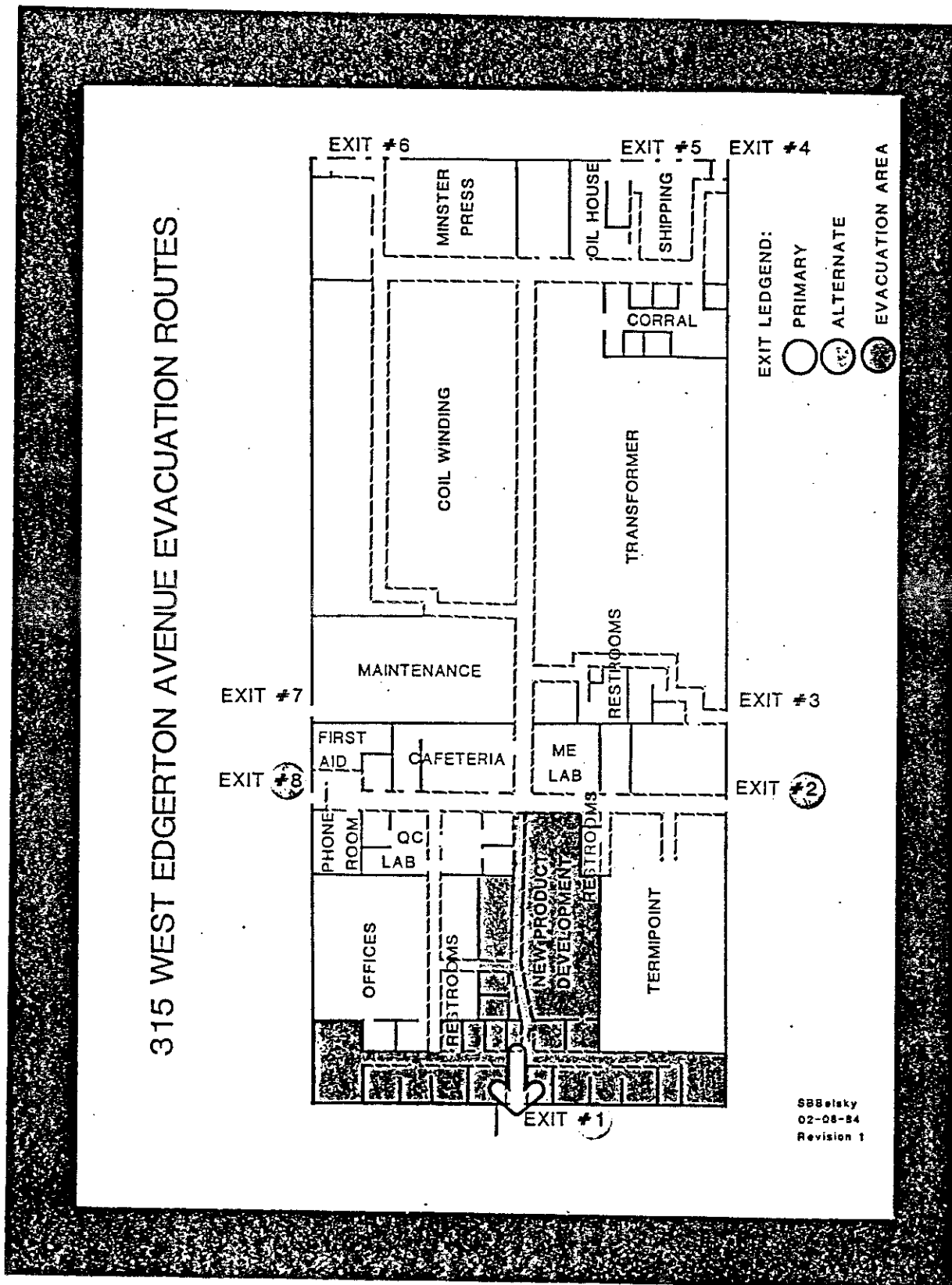


Figure 11a

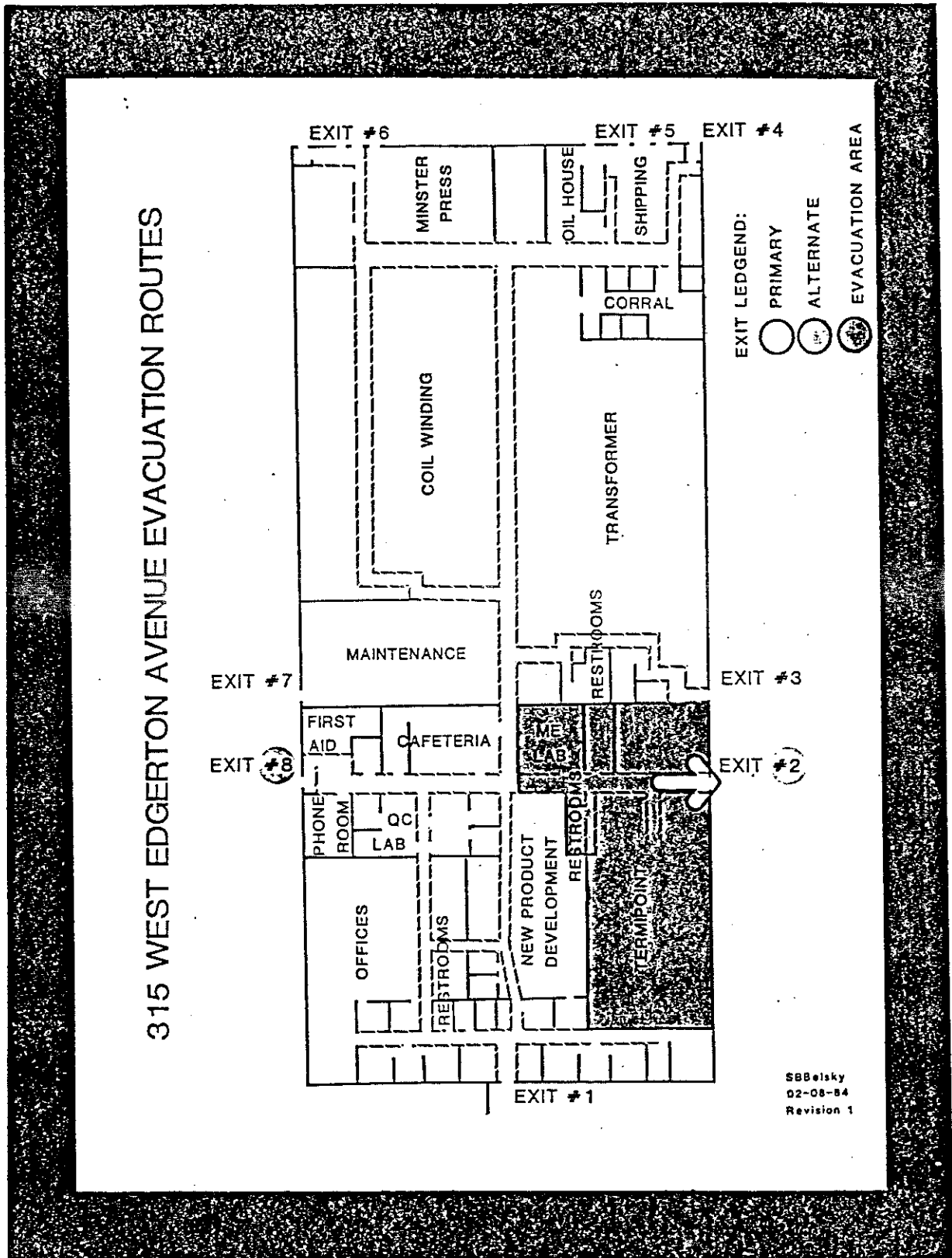


Figure 11b

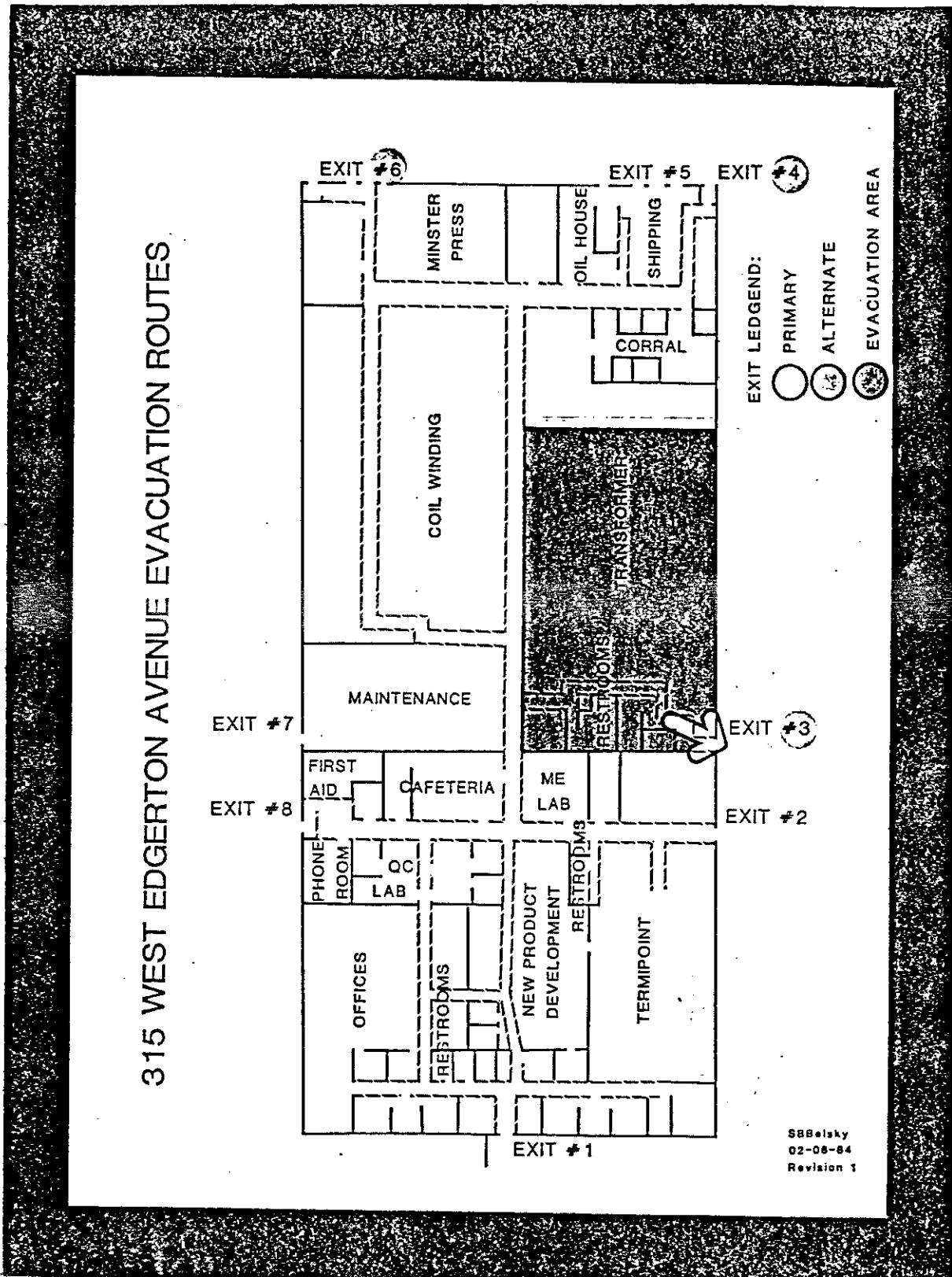


Figure 11c

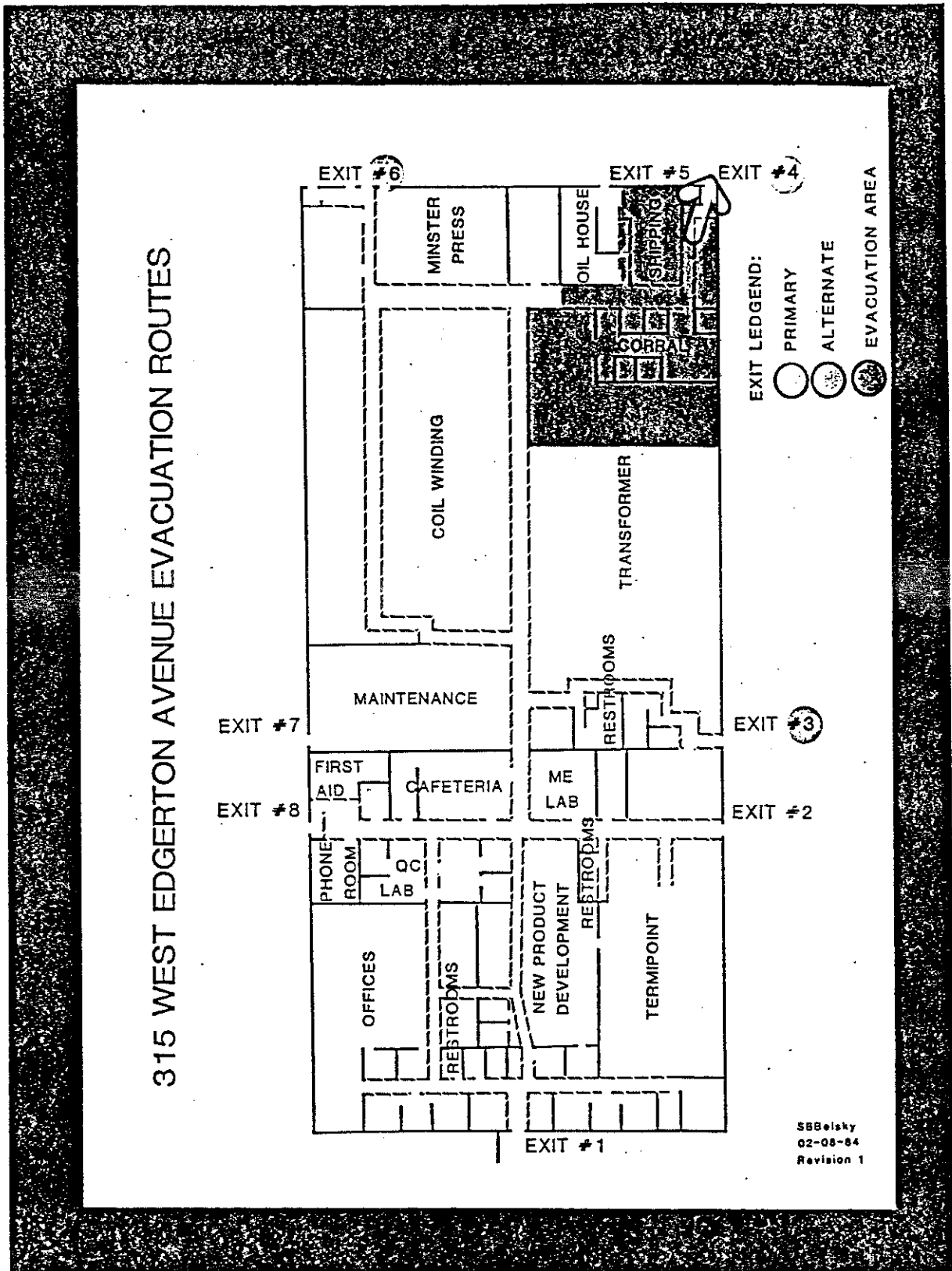


Figure 11d

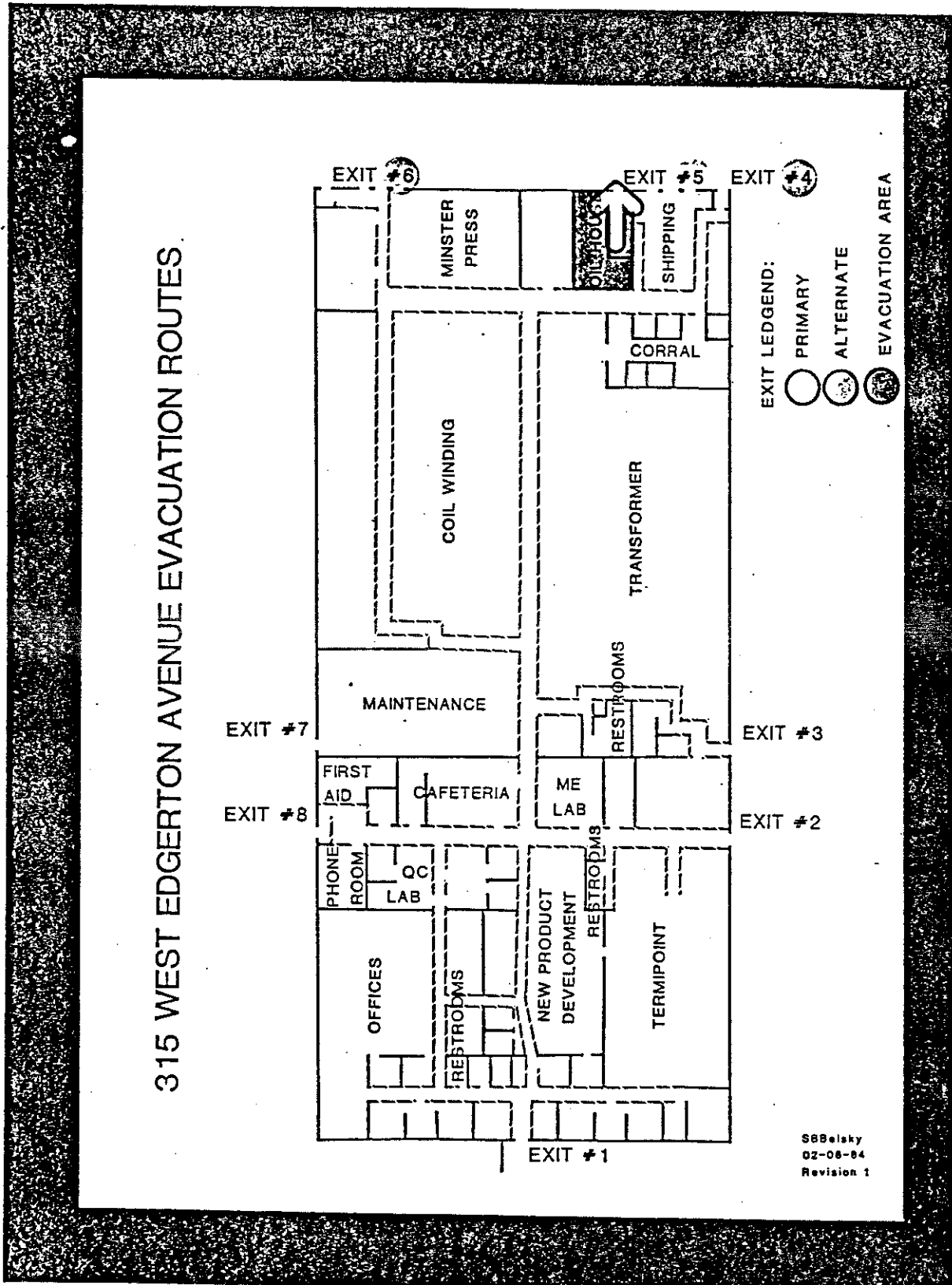


Figure 11e

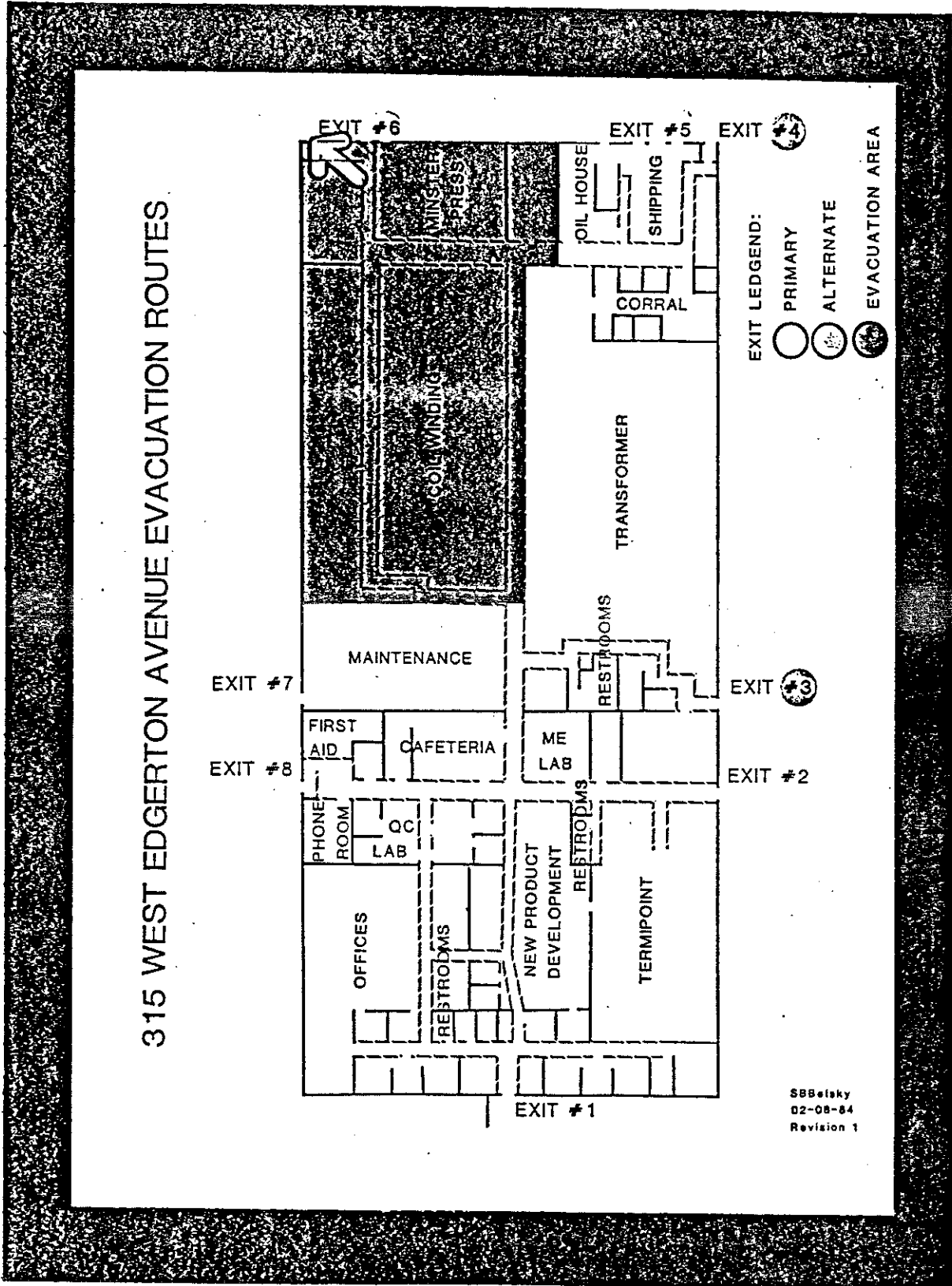


Figure 11f

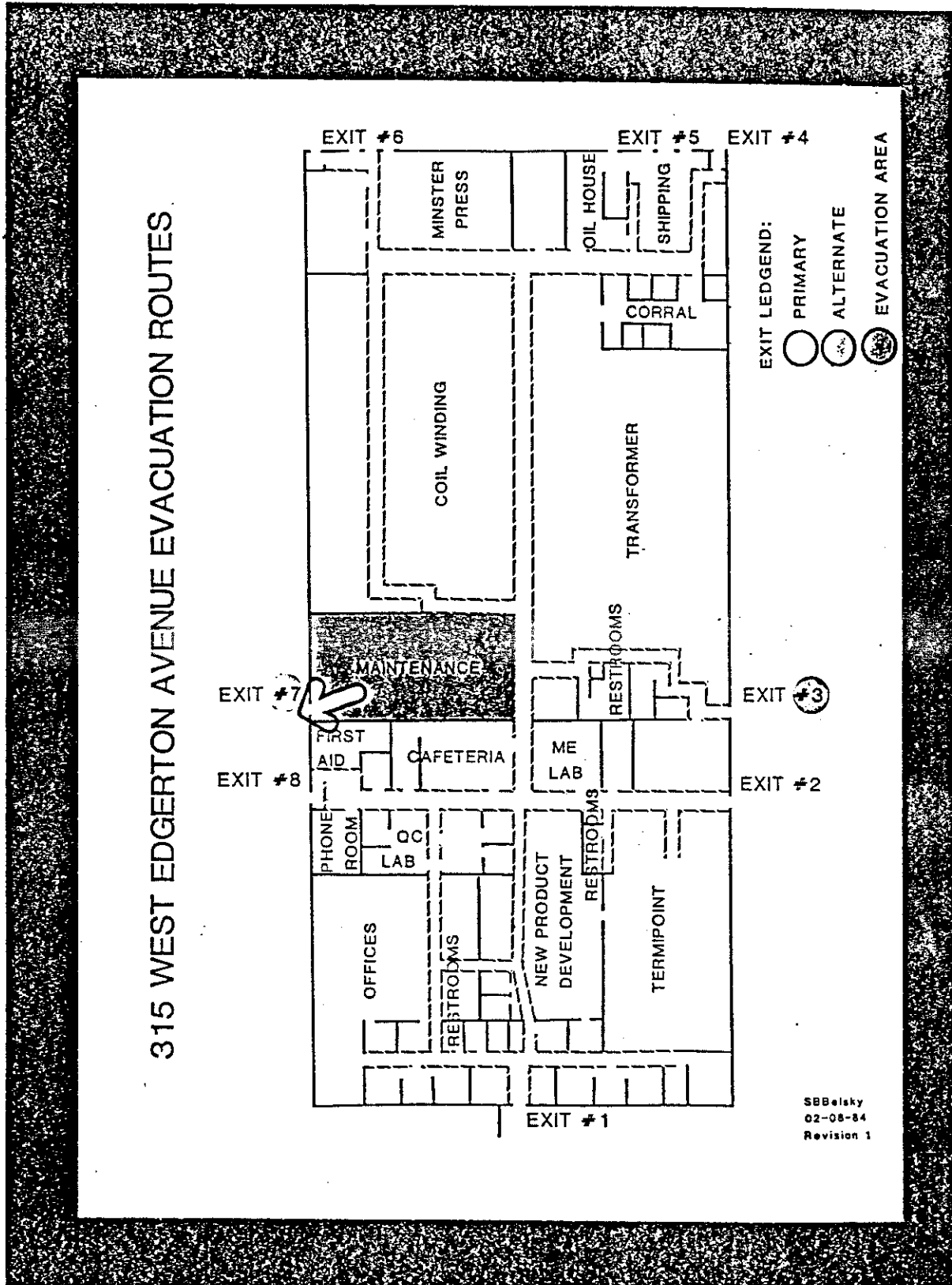
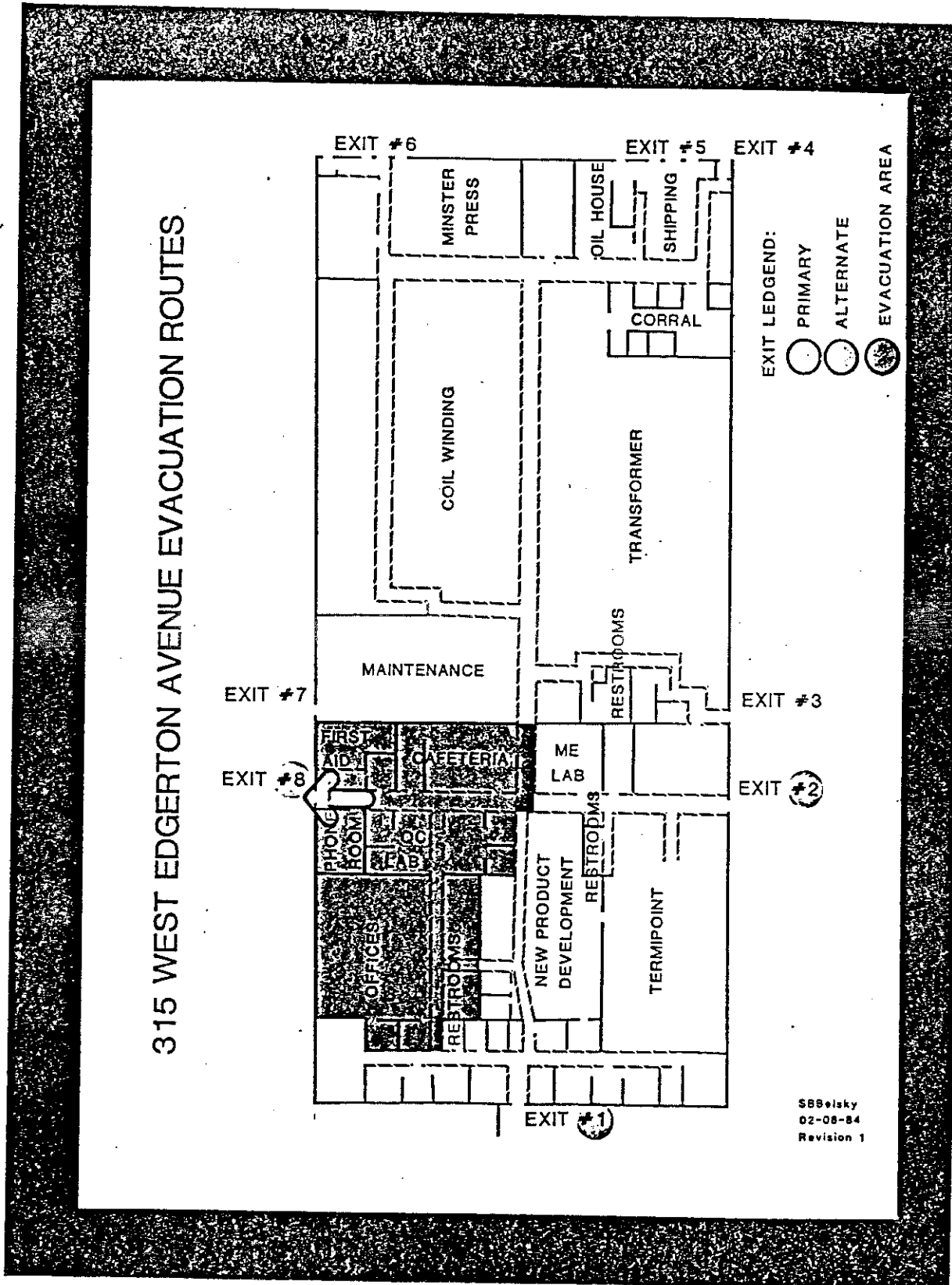


Figure 11g



ATTACHMENT V

CLOSURE PLAN

I

Closure Plans, Post-Closure Plans, and Financial Requirements

This section explains the manner in which the General Electric Company will close the hazardous waste storage facility at 315 W. Edgerton Avenue, Milwaukee, Wisconsin, in a manner that eliminates the need for further maintenance and all threats to human health and the environment, including the threat of post-closure escape of the hazardous waste, rainfall or groundwater contamination, or contamination of the atmosphere.

I-1 Closure Plan

I-1-a Closure Performance Standard

Following cleaning of the facility after removal of all remaining hazardous waste and the removal of all cleaning materials employed, the performance of this cleaning operation will be audited by sampling any soil or other materials which could have been contaminated by the handling of hazardous waste for analysis to ascertain complete removal.

I-1-b Maximum Waste Inventory in Storage During Life of Facility

Anticipated usage levels and removal schedules indicate that there should never be more than 8, 55-gallon drums of hazardous waste in storage at any one time.

I-1-c Procedures for Inventory Removal and Decontamination

Final dispositions of remaining inventory will consist of having the contract hauler remove all filled and partially filled drums remaining. Following checking the outdoor collection tank for drainage and removal and disposal of any found, decontamination will consist of washing the facility with detergent and water. Since the same drainage system is used for the entire "Oil House" facility, this will include washing all of the peripheral collection troughs, the drain line to the collection tank, and the collection tank itself. The washings will be disposed of as hazardous waste through the services of the same contract hauler involved in inventory removal. Any equipment involved in handling the hazardous waste will be decontaminated in a similar manner to the facility itself.

I-1-d Final Closure Schedule

The facility is not expected to be closed in the near future; the date of ultimate closure is estimated to be July 21, 2083. Procedures for determining the effectiveness of decontamination are listed in I-1-a.

At the time of closure, the following schedule will be followed:

1. A closure plan will be submitted to the Regional Administrator 180 days before closure.
2. On the day plant production is discontinued permanently, the facility will stop accepting hazardous waste for storage.
3. Within 90 days, the waste inventory will be disposed of in the manner indicated above.
4. Within 120 days after discontinuing hazardous waste storage, the facility and any equipment involved will be decontaminated.
5. Within 150 days after discontinuing hazardous waste storage, the facility will be closed.
6. When closure is completed, both the Operator and the independent Registered Professional Engineer will certify that the facility has been closed in accordance with the specifications in the closure plan. The independent Registered Professional Engineer will also certify that he is familiar with the facility, that the closure plan exhibits good engineering practice, and that he has examined the final disposition manifest forms.

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I-4 Closure Cost Estimate

TABLE II
CLOSURE COST ESTIMATE

	<u>Minimum</u>
Sampling and analysis of waste (8 drums, 4 types, @ \$300/sample)	\$ 1,200
Landfilling or recycling drums (\$100 per drum)	\$ 800
Decontamination (materials and labor)	\$ 1,500
Certification	\$ 500
Administrative Cost	<u>\$ 1,500</u>
TOTAL	\$ 5,500

ATTACHMENT VI

CONTAINER MANAGEMENT PRACTICES

D-1-a(2) Container Management Practices

Drums stored in the Oil House will be stored closed. Drums will be sealed immediately after contaminated material is added. All drums in the waste storage facility will be labeled. Drum labels will meet EPA and DOT regulations for marking, describing the contents as Hazardous Waste Liquid. Each drum label will also indicate the date the first waste was placed in the drum. The drums will be placed on pallets within the facility to elevate them from contact with any possible standing liquids. The drums will be stacked no higher than 8 feet (2 drums high).

Adequate aisle space will be maintained at all times and the container storage area will be inspected regularly.

Drums will be moved into the storage area using a hand operated drum mover. Employees who use this equipment will be instructed on proper and safe use of this drum mover.

When the storage area is not occupied by authorized personnel, it is locked to ensure safety and security. All hazardous waste drums are individually stored on wood pallets.

ATTACHMENT VI I

PLANS AND SPE CIFI CAT IONS

Figure 9a

N

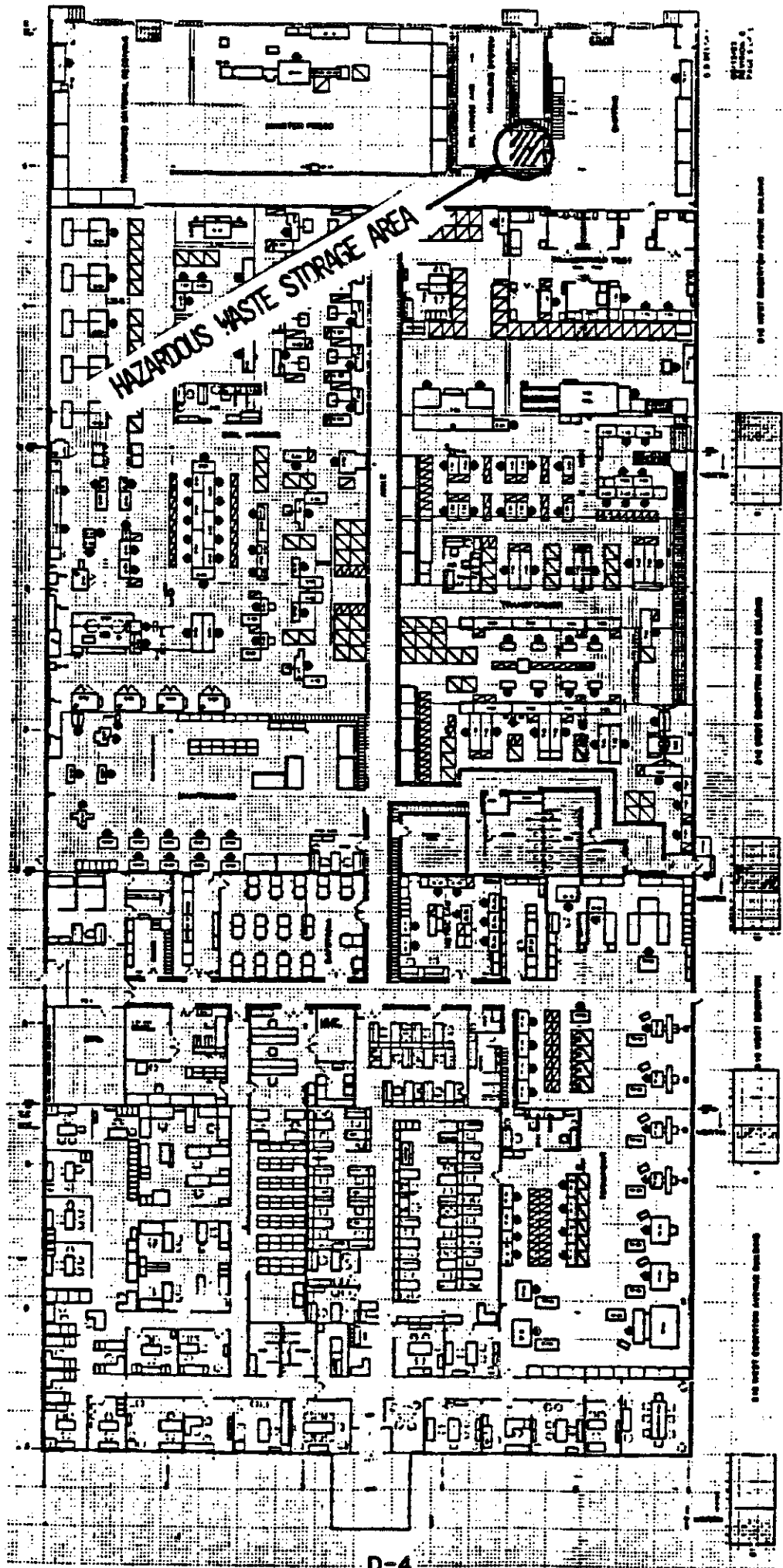
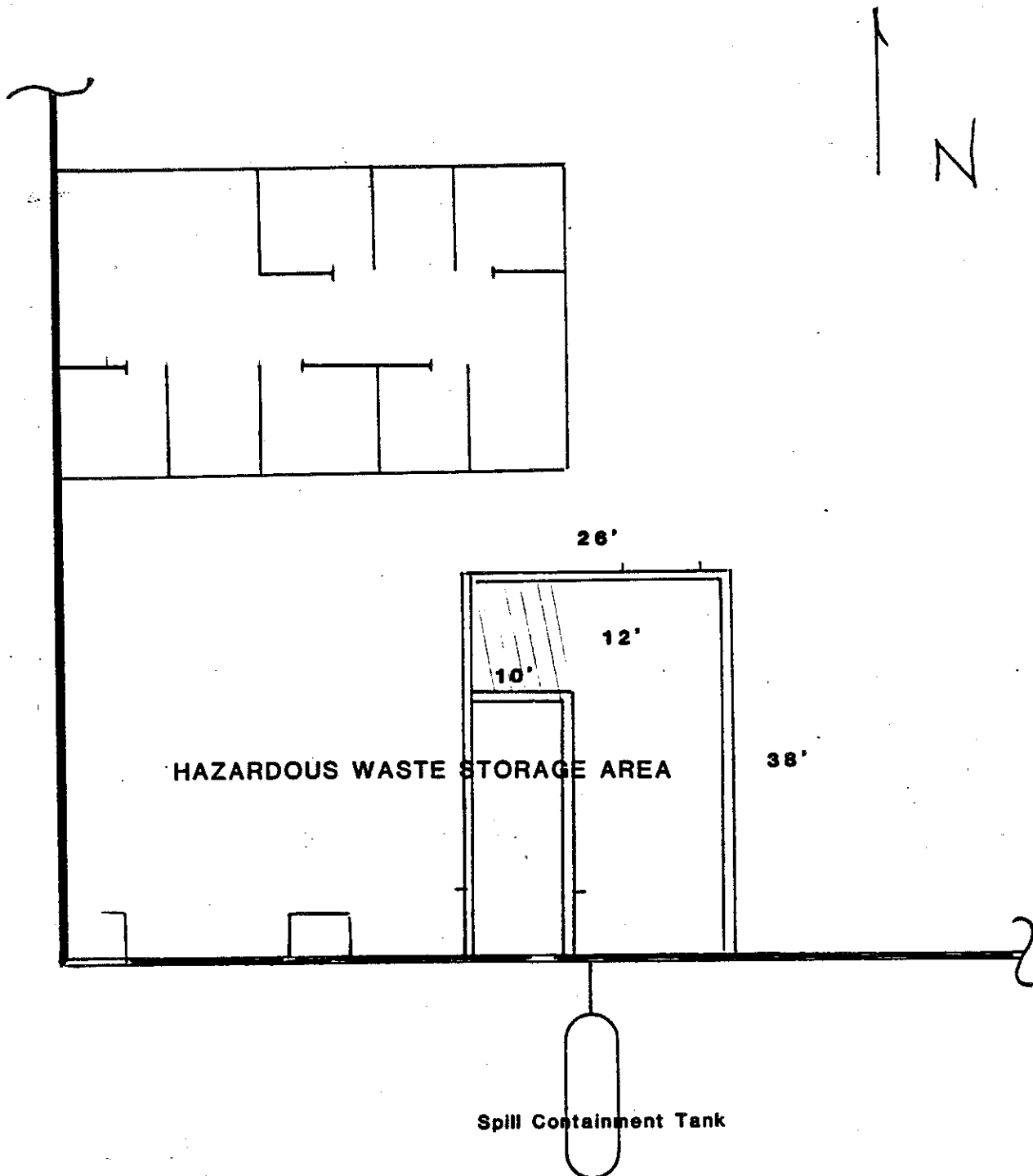


Figure 9b

7/30/84



NOTE: Drain troughs are 12" by 4" deep.

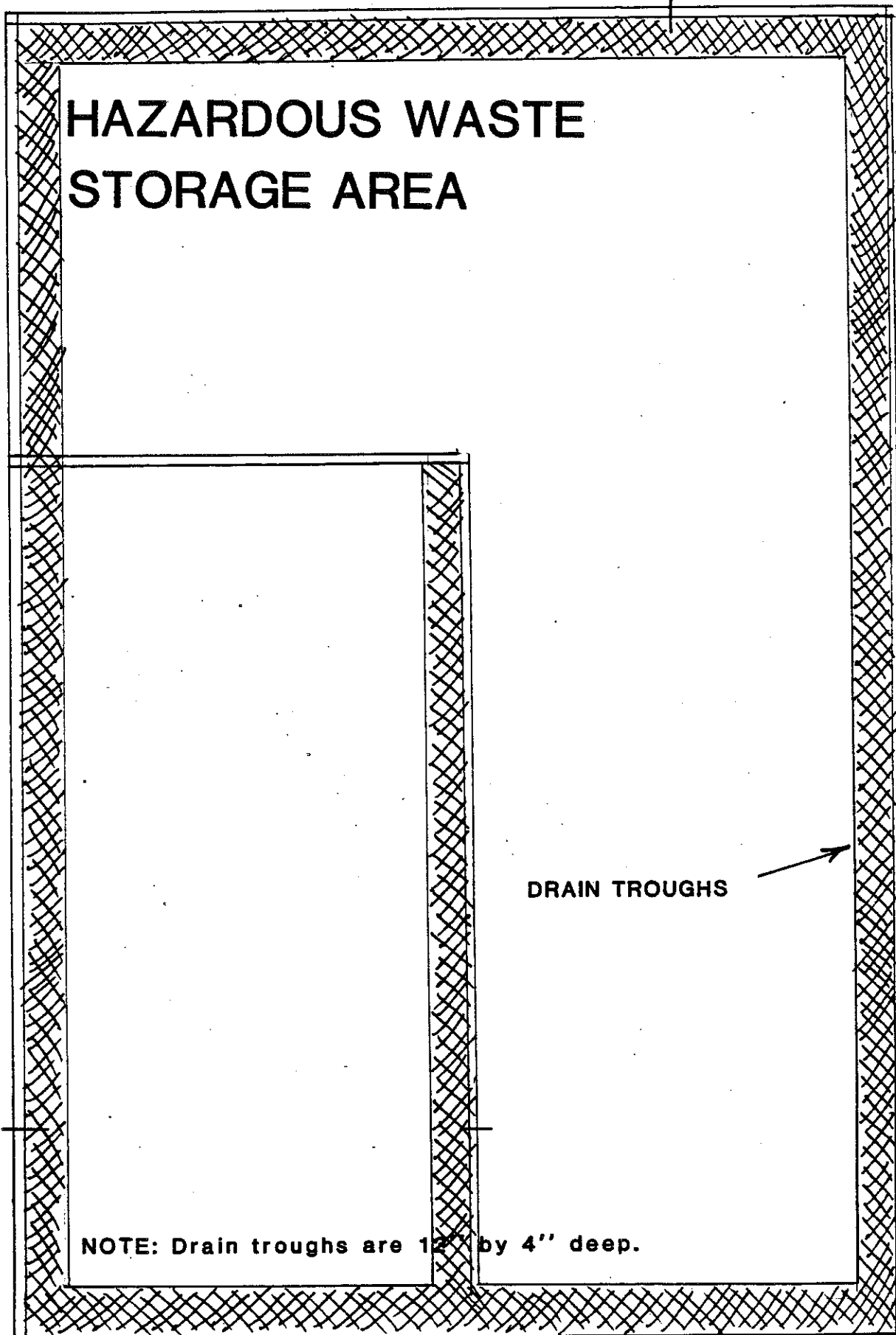
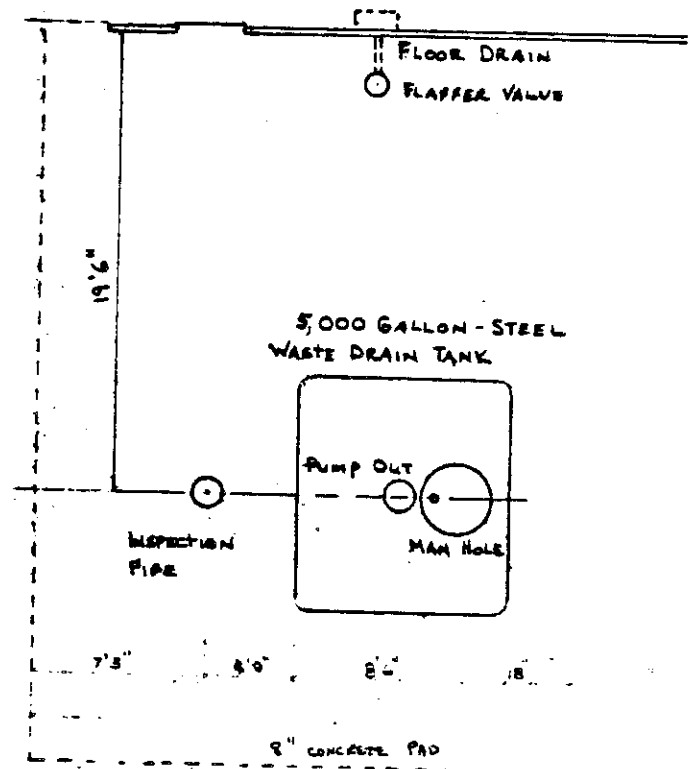
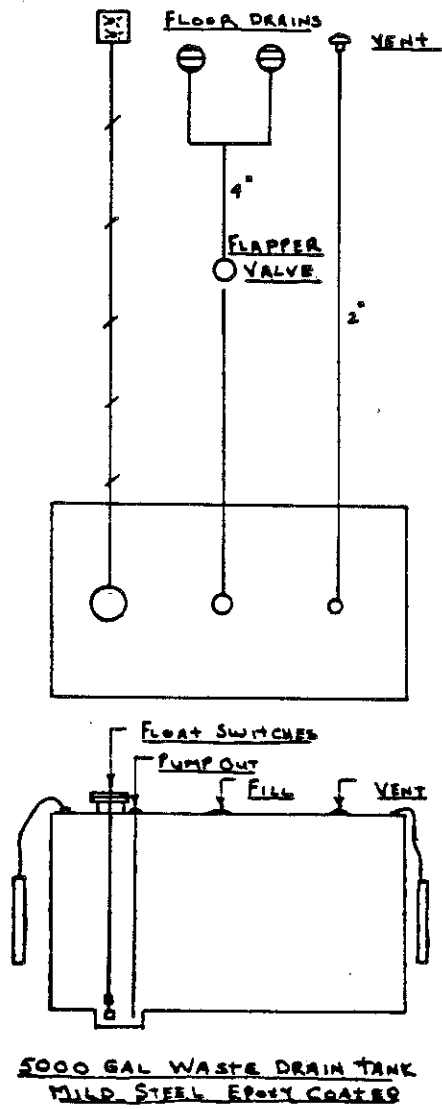
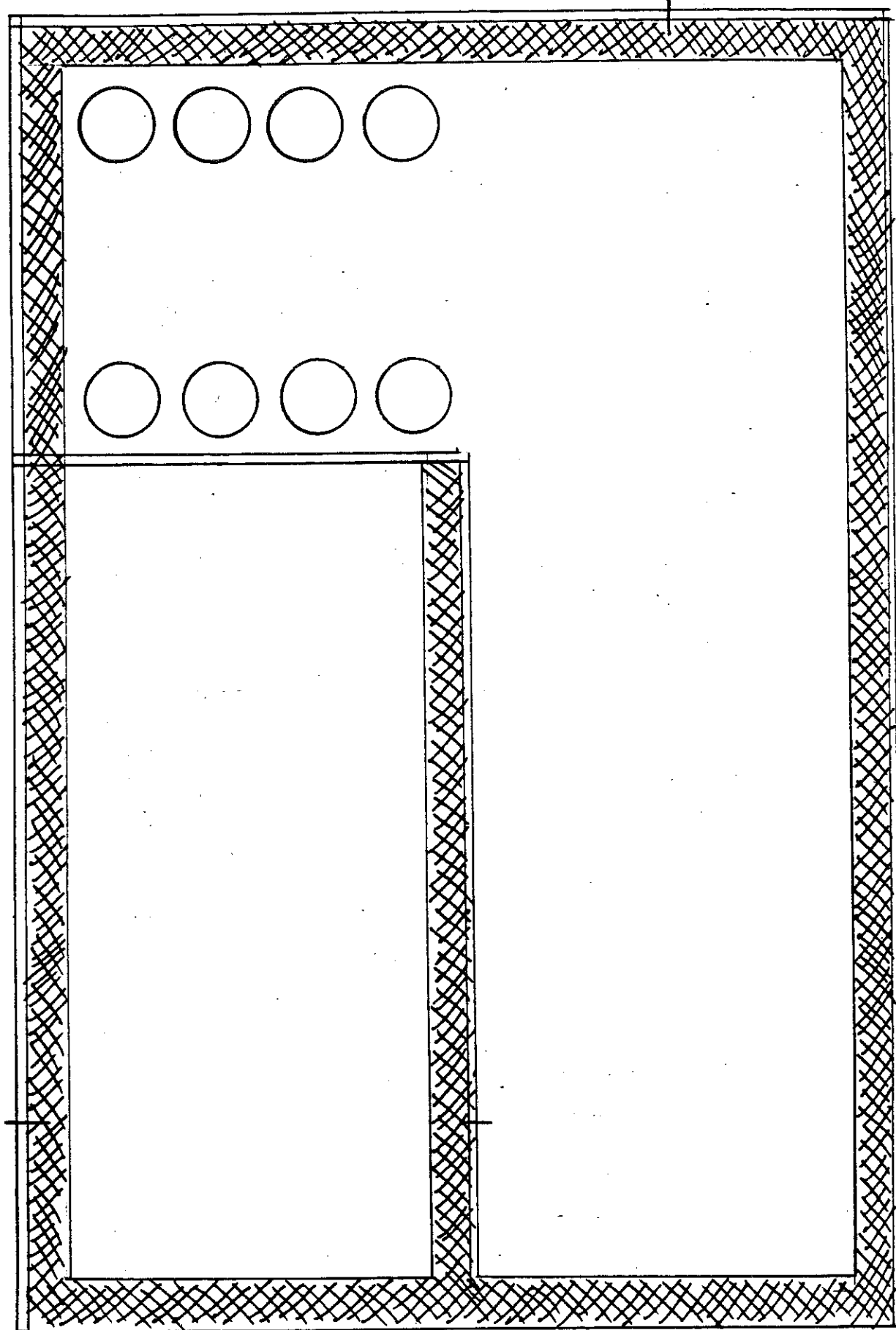


Figure 9d



HAZARDOUS WASTE CONTAINMENT TANK DETAIL

DRUM CONFIGURATION



ATTACHMENT VIII

PROCEDURES FOR HANDLING IGNITABLE WASTES

F-1-a (3) Warning Signs

In addition to warning labels on the drums and general warning signs indicating storage of flammable materials in the Oil House, signs are posted in the waste storage area restricting entry to authorized individuals. The hazard waste storage area has the following signs affixed to the only entrances:

1. Danger - No Smoking
2. Warning - Unauthorized personnel keep out.

These signs are readably visible from a distance of 25 feet or more. They are of standard OSHA approved design.

F-5 Prevention of Ignition or Reaction of Ignitable, Reactive, or Incompatible Wastes

F-5-a Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste

The container storage area is the only place at this facility that ignitable hazardous wastes are stored. No reactive wastes are stored at this facility. Table 1 in Section C lists the hazardous wastes. Stored containers are sealed and kept on pallets. Warning signs are posted as described in Section F-1a(3). Spark proof tools are used on all containers storing ignitable waste. Welding and cutting is not allowed without permit.

Spill Inside Hazardous Waste Storage Area

This area is designed for containment of spills of ignitable and otherwise hazardous materials. A 1,000 cfm exhaust unit with a non-spark wheel and explosion-proof motor is provided to furnish continuous ventilation for the Oil House. Following the procedure given below will assure minimizing hazards.

1. Close all doors of the Hazardous Waste Storage Facility to minimize the effect that vapors may have on other parts of the plant.
2. Squeegee any material which has not already drained to the outdoor collection tank or been picked up by absorbent material into the peripheral troughs and into the tank. Clean-up and containment equipment is located in the Maintenance Department (see Figure 10e).
3. For removal of collected material from the tank, call AAA Environmental Industries, Inc., 541-1440.
4. Report the spill to the individuals listed under G-4-d.

GENERAL ELECTRIC
MEDICAL SYSTEMS DIVISION
JOB SAFETY ANALYSIS

PLAN

DEPARTMENT:

SHIFT:

NEW JOB FUNCTION:

YES
X NO

JOB PERFORMED BY:

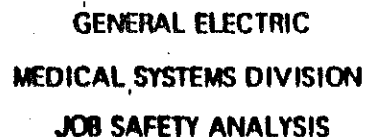
DATE:

PAGE 1 OF 8

JOB FUNCTION ANALYZED: Collection and Disposal of Waste Materials

KEY JOB STEPS	POTENTIAL SAFETY HAZARDS	RECOMMENDED SAFE JOB PROCEDURE AND PERSONAL PROTECTIVE EQUIPMENT
Chemical collection at worksite	Personal injury	Use properly labeled cans for the collection of waste chemicals. Do not mix waste materials!!
		Observe general condition and operation of all waste chemical storage cans
		If can does not close properly or is leaking, replace.
	Fire hazard	Use safety cans for flammable materials
		Avoid flames, sparks & excessive heat

NAME OF PERSON MAKING JOB SAFETY ANALYSIS _____ DATE _____



DEPARTMENT:

SHIFT:

JOB PERFORMED BY:

DATE:

PAGE 2 OF 8

YES
NO

JOB FUNCTION ANALYZED:

Collection and Disposal of Waste Materials (continued)

KEY JOB STEPS

POTENTIAL SAFETY HAZARDS

RECOMMENDED SAFE JOB PROCEDURE AND PERSONAL PROTECTIVE EQUIPMENT

Skin/Eye contact

Avoid skin contact. If chemicals are splashed on skin, wash with soap and large amounts of water. If chemicals are splashed in eyes, use an eye wash for 15-20 minutes. Notify your supervisor and report to the Medical Clinic.

Wear personal protective equipment (rubber gloves, face shield or goggles plastic apron.)

NAME OF PERSON MAKING JOB SAFETY ANALYSIS _____ DATE _____

DATE _____

AIR

GENERAL ELECTRIC
MEDICAL SYSTEMS DIVISION
JOB SAFETY ANALYSIS

PLANT

DEPARTMENT:

SHIFT:

NEW JOB FUNCTION:

YES
X NO

JOB PERFORMED BY:

DATE:

PAGE 3 OF 8

JOB FUNCTION ANALYZED:

Collection and Disposal of Waste Materials (continued)

KEY JOB STEPS	POTENTIAL SAFETY HAZARDS	RECOMMENDED SAFE JOB PROCEDURE AND PERSONAL PROTECTIVE EQUIPMENT
	Fumes and vapors	Avoid prolonged breathing of chemical vapors.
		Keep containers covered when not in use.
	Solvent spills	Clean up minor spills promptly. Avoid skin contact. Avoid breathing vapor.
		Notify supervisor in the event of large spills.
Transportation of waste chemicals to 55 gallon accumulation drums.	Solvent spills	Transport container carefully and be aware of the fact that the waste chemical is splashing around during transport.
		Keep container closed during transportation

NAME OF PERSON MAKING JOB SAFETY ANALYSIS

DATE

GENERAL ELECTRIC MEDICAL SYSTEMS DIVISION JOB SAFETY ANALYSIS	PLANT: _____	NEW JOB FUNCTION: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
	DEPARTMENT: _____	JOB PERFORMED BY: _____	
	SHIFT: _____	DATE: _____	PAGE <u>4</u> OF <u>8</u>

JOB FUNCTION ANALYZED: Collection and Disposal of Waste Materials (continued)

KEY JOB STEPS	POTENTIAL SAFETY HAZARDS	RECOMMENDED SAFE JOB PROCEDURE AND PERSONAL PROTECTIVE EQUIPMENT
Transferring waste material from collection can to 55 gallon accumulation drum.	Personal injury	Do not mix waste materials. Chemical reactions may occur.
		Transfer chemical to properly labeled and dated 55 gallon drum. Notify your supervisor if the drum is not properly labeled and dated.
		Observe the general condition of the drum. If the container is leaking, notify your supervisor.
	Eye/Skin contact	Avoid skin contact. If chemicals are splashed on skin, wash with soap and large amounts of water. If chemicals are splashed in eyes, use an eye wash for 15-20 minutes. Notify your supervisor and report to the medical clinic.

NAME OF PERSON MAKING JOB SAFETY ANALYSIS _____ DATE _____

GENERAL ELECTRIC
MEDICAL SYSTEMS DIVISION
JOB SAFETY ANALYSIS

PLANT

DEPARTMENT:

SHIFT:

NEW JOB FUNCTION:

YES
NO

JOB PERFORMED BY:

DATE:

PAGE 5 OF 8

JOB FUNCTION ANALYZED:

Collection and Disposal of Waste Materials (continued)

KEY JOB STEPS

POTENTIAL SAFETY
HAZARDS

RECOMMENDED SAFE JOB
PROCEDURE AND PERSONAL
PROTECTIVE EQUIPMENT

Wear personal protective equipment
(rubber gloves, face shield or goggles,
plastic apron).

Fumes and vapors

Avoid prolonged breathing of chemical
vapors.

Drum must be stored closed when not
in use.

Chemical spills

Clean up minor spills promptly. Avoid
breathing vapor. Notify supervisor in
the event of large spills.

Fire hazard

Drums for flammable materials must
be grounded.

NAME OF PERSON MAKING JOB SAFETY ANALYSIS

DATE

GENERAL ELECTRIC
MEDICAL SYSTEMS DIVISION
JOB SAFETY ANALYSIS

PLANT:

DEPARTMENT:

SHIFT:

NEW JOB FUNCTION:

YES
X NO

JOB PERFORMED BY:

DATE:

PAGE 6 OF 8

JOB FUNCTION ANALYZED:

Collection and Disposal of Waste Materials (continued)

KEY JOB STEPS	POTENTIAL SAFETY HAZARDS	RECOMMENDED SAFE JOB PROCEDURE AND PERSONAL PROTECTIVE EQUIPMENT
		Avoid flames, sparks, & excessive heat.
Movement of drums to drum storage area,	Lift truck breakdown	Check lift truck without load. Dead man throttle control automatic break function, and raise and lower switches.
	Collision./tripping. Movement of material on skids/pallets by industrial truck presents hazards with improper use of powered equipment. Load shifting and possible spillage occur with sudden stop of moving loads. Faulty pallets and collars allow shifting materials to escape and fall out of raised skid.	Move cautiously -- load properly secured and balanced. Watch for foot or mobile traffic. Keep load at safe height. Maintain unobstructed work areas while arranging materials. Report loads with faulty pallets/skids received in area.
	Improper manual lifting, shifting or	

NAME OF PERSON MAKING JOB SAFETY ANALYSIS _____

DATE _____

GENERAL ELECTRIC
MEDICAL SYSTEMS DIVISION
JOB SAFETY ANALYSIS

PLANT

DEPARTMENT:

SHIFT:

NEW JOB FUNCTION:

YES

NO

JOB PERFORMED BY:

DATE:

PAGE 7 OF 8

JOB FUNCTION ANALYZED:

Collection and Disposal of Waste Materials (continued)

KEY JOB STEPS

POTENTIAL SAFETY
HAZARDS

RECOMMENDED SAFE JOB
PROCEDURE AND PERSONAL
PROTECTIVE EQUIPMENT

movement of parts/containers create
condition for body strain.

Backing up with lift truck pinning body
against object.

Move cautiously -- back up powered
hand truck only when body is positioned
to prevent entrapment.

Equipment malfunction due to low
battery condition

Do not operate side loader when
equipment warning lights are on.

Chemical spills

Report spill to supervisor. Contain
spilled material refer to P&P 10.501X
Spill Prevention and Control, Refer
to P&P 10.504X Environmental
Reporting.

Fire hazards

Avoid flames, sparks and excessive
heat.

NAME OF PERSON MAKING JOB SAFETY ANALYSIS

DATE

AH-7



GENERAL ELECTRIC
MEDICAL SYSTEMS DIVISION
JOB SAFETY ANALYSIS

PLANT

DEPARTMENT:

SHIFT:

NEW JOB FUNCTION:

YES
NO

JOB PERFORMED BY:

DATE:

PAGE 8 OF 8

JOB FUNCTION ANALYZED:

Collection and Disposal of Waste Material (continued)

KEY JOB STEPS	POTENTIAL SAFETY HAZARDS	RECOMMENDED SAFE JOB PROCEDURE AND PERSONAL PROTECTIVE EQUIPMENT
Final shipment of waste materials	Fire hazard	Avoid flames, sparks, and excessive heat.
	Fumes and vapors	Drums must be closed for loading and transportation.
	Personal injury	Observe the general condition of the drum. If the container is leaking, notify your supervisor. Reference -- P&P 10, 505X Solid and Liquid Waste Disposal.

NAME OF PERSON MAKING JOB SAFETY ANALYSIS _____

DATE _____